

Exhibit 11

APPENDIX APPLE-859: APPLE’S INFRINGEMENT OF U.S. PATENT NO. 6,963,859**SECTION 1: Apple Accused Products—iTunes Videos**

Claim 1	Apple Accused Products (iTunes Videos)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content, said rendering system comprising:	<p>Apple’s Accused Instrumentalities that support the iTunes application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the “Apple Accused Instrumentalities”) Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below).¹</p> <p>Specifically, each of these Apple Accused Instrumentalities configured to activate the iTunes application (“iTunes App”), which is available on any Device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>

¹ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="661 237 1808 865"> <div> <p>TV Shows. Tune in to your favorites anytime—and anywhere—you want.</p> <p>iTunes brings you more than 250,000 TV shows commercial-free² — many in 1080p HD.³ Buy individual episodes or a full season. With Season Pass, you can even buy a full season before it airs. And with Complete My Season, you can buy an episode or two to check out a show, then get the whole season for the original price minus what you've already paid. Whether you buy on your Mac, PC, or iOS device, TV shows are instantly accessible in your iTunes library, where you can play them or download a copy to take with you. Perfect for when you're traveling and won't have Wi-Fi.</p> </div> <div> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> </div> <p>https://www.apple.com/itunes/features/</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
a rendering device	Each of the Apple Accused Instrumentalities configures a rendering device configured to render the

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Claim 1	Apple Accused Products (iTunes Videos)
configured to render the content; and	<p>content.</p> <p>For example, the Apple Accused Instrumentalities is configured to render the video which is rented or purchased from iTunes Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 10px;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="953 228 1518 828"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <p data-bbox="558 867 1050 899">http://www.apple.com/itunes/features/</p>
a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,	<p data-bbox="558 943 1913 1084">Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to the rendering device and including a requester mode of operation and server mode of operation.</p> <p data-bbox="558 1125 1913 1230">The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iTunes Videos app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p data-bbox="558 1271 1787 1344">The Apple Accused iOS devices running the iTunes Videos app take steps to enforce behavioral integrity.</p> <p data-bbox="558 1385 1833 1412">For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>signed using a digital certificate. The digital certificate is checked during installation and update of iTunes Videos App. Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="695 375 1776 1187" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce communication integrity.</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the client is a trusted entity.</p> <div data-bbox="688 412 1782 730" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>SSL, TLS</p> <p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="617 841 1852 1390" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p>This message conveys the server's certificate chain to the client.</p> <p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 233 1157 266">http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p data-bbox="562 306 1881 341">The Apple Accused iOS devices running the iTunes Videos app take steps to enforce physical integrity.</p> <p data-bbox="562 381 1835 448">For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="835 237 1423 375"> <h2>Encryption and Data Protection</h2> </div> <div data-bbox="835 513 1625 716"> <p>The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p> </div> <div data-bbox="835 764 1171 797"> <h3>Hardware Security Features</h3> </div> <div data-bbox="835 813 1612 894"> <p>On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p> </div> <div data-bbox="835 919 1602 1032"> <p>Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p> </div> <div data-bbox="835 1049 1633 1308"> <p>The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p> </div> <div data-bbox="558 1365 1444 1398"> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="598 240 1873 740" style="border: 1px solid black; padding: 10px;"> <p data-bbox="611 245 1062 266">USE OF PURCHASED OR RENTED CONTENT</p> <p data-bbox="611 310 1862 716">You agree that the iTunes Service and certain iTunes Products include security technology that limits your use of iTunes Products and that, whether or not iTunes Products are limited by security technology, you shall use iTunes Products in compliance with the applicable usage rules established by Apple and its licensors ("Usage Rules"), and that any other use of the iTunes Products may constitute a copyright infringement. Any security technology is an inseparable part of the iTunes Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the iTunes Service by any means other than through software that is provided by Apple for accessing the iTunes Service. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the iTunes Service. Violations of system or network security may result in civil or criminal liability.</p> </div> <p data-bbox="560 781 1554 808">http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p data-bbox="560 854 1906 1029">For example, when the user attempts to use any of the Apple Accused Instrumentalities to download a rented or purchased video, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iTunes Store) for access to the content.</p> <p data-bbox="560 1075 1856 1250">Further, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and plays the video according to the usage rights associated with the video.</p> <p data-bbox="560 1295 1854 1395">Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="562 266 1898 310"> <h2>Download past purchases Languages English</h2> </div> <div data-bbox="562 337 1864 402"> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> </div> <div data-bbox="562 480 808 513"> <p>Before you begin</p> </div> <div data-bbox="573 537 1866 716"> <ol style="list-style-type: none"> 1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item. 2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country. </div> <div data-bbox="554 781 1031 813"> <p>http://support.apple.com/kb/HT2519</p> </div> <div data-bbox="695 867 1241 899"> <p>Movies, TV shows, or music videos</p> </div> <div data-bbox="711 907 1661 1029"> <ol style="list-style-type: none"> 1. Tap Settings > Videos and make sure Show All Videos is on. 2. Tap the Videos app. 3. Tap Movies, Music Videos, or TV Shows at the bottom of the page. </div> <div data-bbox="758 1053 1234 1127">  </div> <div data-bbox="711 1162 1325 1247"> <ol style="list-style-type: none"> 4. Find the item that you want to download. 5. Tap the Download  icon. </div> <div data-bbox="554 1330 1031 1362"> <p>http://support.apple.com/kb/HT2519</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="974 261 1503 345"> <p>Movies. Now showing on all your screens.</p> </div> <div data-bbox="974 370 1476 760"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <div data-bbox="554 865 1052 898"> <p>http://www.apple.com/itunes/features/</p> </div> <div data-bbox="659 956 1029 985"> <p>Browsing and buying videos</p> </div> <div data-bbox="659 990 1803 1146"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="659 1177 879 1205"> <p>Watching videos</p> </div> <div data-bbox="659 1211 1793 1269"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="659 1300 1740 1359"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	http://support.apple.com/kb/HT1304
<p>wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="667 250 1024 277" data-label="Section-Header">Browsing and buying videos</div> <div data-bbox="667 285 1801 440" data-label="Text"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="667 469 877 496" data-label="Section-Header">Watching videos</div> <div data-bbox="667 505 1793 561" data-label="Text"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="667 594 1738 651" data-label="Text"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <div data-bbox="562 712 1031 748" data-label="Text"> <p>http://support.apple.com/kb/HT1304</p> </div> <div data-bbox="953 816 1094 854" data-label="Section-Header">Movies.</div> <div data-bbox="953 857 1528 899" data-label="Text"> <p>Now showing on all your screens.</p> </div> <div data-bbox="953 922 1499 1308" data-label="Text"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 237 1052 264">http://www.apple.com/itunes/features/</p> <div data-bbox="573 264 1898 829"><p data-bbox="625 297 1428 324">To rent movies from the iTunes Store on your computer</p><ol data-bbox="638 350 1377 451" style="list-style-type: none"><li data-bbox="638 350 1203 378">1. In iTunes on your computer, click iTunes Store.<li data-bbox="638 386 1234 414">2. In the iTunes Store, find a movie you want to rent.<li data-bbox="638 422 1377 451">3. Click Rent. Your rental should begin to download immediately.<p data-bbox="625 488 1850 553">Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p><ol data-bbox="638 591 1591 727" style="list-style-type: none"><li data-bbox="638 591 1146 618">1. Connect the device and select it in iTunes.<li data-bbox="638 626 942 654">2. Click the Movies button.<li data-bbox="638 662 1096 690">3. Select the movie, and then click Move.<li data-bbox="638 698 1591 727">4. After all movies have been moved, click Apply in the lower-right corner of iTunes.<p data-bbox="625 764 1362 792">You must be connected to the Internet to transfer a rented movie.</p></div> <p data-bbox="562 873 1031 901">http://support.apple.com/kb/HT1390</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="625 256 1860 347"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="625 370 1787 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="625 505 1243 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="642 566 1854 1013"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="558 1092 1014 1127"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1179 1860 1304"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="558 1367 1556 1399"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>



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<p>the requester mode of operation is operative to request access to content from another distributed repository, and</p>	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a purchased or rented video (by tapping on the download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iTunes Store) for access to the content.</p> <div data-bbox="573 667 1896 1157" style="border: 1px solid black; padding: 10px;"> <p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> </div> <p>http://support.apple.com/kb/HT1491</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="617 256 1430 289" data-label="Section-Header"> <p>To rent movies from the iTunes Store on your computer</p> </div> <div data-bbox="632 310 1379 412" data-label="List-Group"> <ol style="list-style-type: none"> 1. In iTunes on your computer, click iTunes Store. 2. In the iTunes Store, find a movie you want to rent. 3. Click Rent. Your rental should begin to download immediately. </div> <div data-bbox="617 449 1850 514" data-label="Text"> <p>Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p> </div> <div data-bbox="632 552 1593 690" data-label="List-Group"> <ol style="list-style-type: none"> 1. Connect the device and select it in iTunes. 2. Click the Movies button. 3. Select the movie, and then click Move. 4. After all movies have been moved, click Apply in the lower-right corner of iTunes. </div> <div data-bbox="617 725 1365 753" data-label="Text"> <p>You must be connected to the Internet to transfer a rented movie.</p> </div> <div data-bbox="554 831 1031 865" data-label="Text"> <p>http://support.apple.com/kb/HT1390</p> </div> <div data-bbox="567 904 1081 950" data-label="Section-Header"> <p>Download past purchases</p> </div> <div data-bbox="1680 911 1887 938" data-label="Text"> <p>Languages English</p> </div> <div data-bbox="564 971 1871 1040" data-label="Text"> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> </div> <div data-bbox="564 1115 814 1149" data-label="Section-Header"> <p>Before you begin</p> </div> <div data-bbox="577 1172 1873 1352" data-label="List-Group"> <ol style="list-style-type: none"> 1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item. 2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country. </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 233 1031 264">http://support.apple.com/kb/HT2519</p> <div data-bbox="653 302 1818 743" style="border: 1px solid black; padding: 10px;"> <p data-bbox="703 321 1239 352">Movies, TV shows, or music videos</p> <ol data-bbox="722 362 1659 483" style="list-style-type: none"> <li data-bbox="722 362 1575 393">1. Tap Settings > Videos and make sure Show All Videos is on. <li data-bbox="722 402 1031 433">2. Tap the Videos app. <li data-bbox="722 443 1659 483">3. Tap Movies, Music Videos, or TV Shows at the bottom of the page. <div data-bbox="762 505 1239 578" style="border: 1px solid black; height: 45px; margin: 10px 0; text-align: center;">  </div> <ol data-bbox="722 615 1323 699" style="list-style-type: none"> <li data-bbox="722 615 1323 646">4. Find the item that you want to download. <li data-bbox="722 656 1129 699">5. Tap the Download  icon. </div> <p data-bbox="562 784 1031 815">http://support.apple.com/kb/HT2519</p>
<p data-bbox="184 862 527 1219">said distributed repository is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p data-bbox="562 862 1881 1036">On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p data-bbox="562 1081 1906 1295">For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p data-bbox="562 1341 1885 1401">For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<p>information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="625 558 1845 1005" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="945 259 1533 755"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <div data-bbox="556 852 1050 889"> <p>http://www.apple.com/itunes/features/</p> </div>

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Claim 1	Apple Accused Products (iTunes Videos)
	<div data-bbox="625 256 1860 347"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="625 370 1787 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="625 505 1243 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="642 566 1852 1013"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="558 1092 1014 1127"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1179 1858 1304"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="558 1367 1556 1399"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>

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Claim 3	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, wherein said repository comprises means for storing the content.	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 5	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 3 wherein said means for storing comprises means for storing content after rendering.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when the user downloads a purchased or rented video ((by tapping on the download icon displayed on the Apple Accused Instrumentality), it gets downloaded and is stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). On information and belief, user can view the video unlimited number of times within the 'Rental period' in case of rented videos and for purchased videos within the time period till iTunes is entitled to provide the video to its users.</p> <p>Further, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and</p>

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Claim 5	Apple Accused Products (iTunes Videos)
	<p>supports usage rights) and an internal memory for storing the content after rendering.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div data-bbox="625 521 1845 969" style="border: 1px solid black; padding: 10px;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 5	Apple Accused Products (iTunes Videos)
	<div data-bbox="945 261 1528 753"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <div data-bbox="554 854 1052 889"> <p>http://www.apple.com/itunes/features/</p> </div>

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Claim 5	Apple Accused Products (iTunes Videos)
	<div data-bbox="604 256 1839 347"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="604 370 1766 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="604 505 1220 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="621 568 1829 1013"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="562 1094 1010 1127"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1179 1856 1305"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="562 1370 1551 1403"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>

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Claim 8	Apple Accused Products (iTunes Videos)
<p>A rendering system as recited in claim 5 wherein the content comprises video.</p>	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content comprising video.</p> <p>For example, the content provided by the iTunes store are videos for rent/ purchase which can be rendered on the Apple Accused Instrumentalities.</p> <div data-bbox="921 558 1547 1148" style="border: 1px solid black; padding: 10px; margin: 10px auto; width: 60%;"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <p>http://www.apple.com/itunes/features/</p>

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Claim 8	Apple Accused Products (iTunes Videos)
	<p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> <hr/> <p>http://support.apple.com/kb/HT1491</p>
Claim 13	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, wherein said rendering device comprises a video system.	<p>Each of the Apple Accused Instrumentalities comprises a rendering device that comprises a video system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a rendering device that can play (render) movies and TV shows and thus comprise a video system.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

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Claim 13	Apple Accused Products (iTunes Videos)
	<div data-bbox="945 259 1533 755"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <p data-bbox="558 852 1050 889">http://www.apple.com/itunes/features/</p> <div data-bbox="604 941 1841 1388"> <p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> </div>

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Claim 13	Apple Accused Products (iTunes Videos)
	http://support.apple.com/kb/HT1491
Claim 15	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1 wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iTunes App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>
Claim 16	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered (e.g., executed) on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permits the rendering of the video within the</p>

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Claim 16	Apple Accused Products (iTunes Videos)
	<p>expiry time of the video. In case of rented videos, the expiry time is the ‘Rental Period’ and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality’s repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="625 597 1845 1044" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 16	Apple Accused Products (iTunes Videos)		
		<p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p>	
	http://www.apple.com/itunes/features/		

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Claim 16	Apple Accused Products (iTunes Videos)
	<div data-bbox="604 256 1837 349"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="604 370 1766 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="604 505 1220 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="621 570 1829 1015"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="562 1096 1010 1128"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1182 1858 1307" style="border: 1px solid black; padding: 5px;"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="562 1372 1549 1404"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>

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Claim 19	Apple Accused Products (iTunes Videos)
<p>A rendering system as recited in claim 1, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be displayed on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the displaying of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the displaying accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not displayed on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 19	Apple Accused Products (iTunes Videos)
	<div data-bbox="667 250 1026 279" data-label="Section-Header">Browsing and buying videos</div> <div data-bbox="667 285 1801 440" data-label="Text"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="667 469 877 498" data-label="Section-Header">Watching videos</div> <div data-bbox="667 505 1793 561" data-label="Text"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="667 592 1740 649" data-label="Text"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <div data-bbox="562 712 1031 747" data-label="Text"> <p>http://support.apple.com/kb/HT1304</p> </div> <div data-bbox="951 815 1094 854" data-label="Section-Header">Movies.</div> <div data-bbox="951 855 1528 899" data-label="Text"> <p>Now showing on all your screens.</p> </div> <div data-bbox="951 922 1499 1307" data-label="Text"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 19	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 233 1052 264">http://www.apple.com/itunes/features/</p> <div data-bbox="562 302 1866 1130"> <p data-bbox="604 331 1442 418">iTunes Store: Movie rental usage rights in the United States</p> <p data-bbox="1677 339 1839 365">Languages Engli</p> <p data-bbox="604 444 1766 506">You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p data-bbox="604 579 1220 605">The iTunes Store movie rental usage rules are as follows:</p> <ul data-bbox="621 643 1829 1084" style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <p data-bbox="562 1170 1010 1201">http://support.apple.com/kb/ht1415</p> <div data-bbox="604 1239 1877 1382"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div>

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Claim 19	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE
Claim 20	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, wherein the manner of use is a manner of playing.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be played on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the playing of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the playing accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not played on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 20	Apple Accused Products (iTunes Videos)
	<div data-bbox="667 250 1026 277" data-label="Section-Header">Browsing and buying videos</div> <div data-bbox="667 285 1801 440" data-label="Text"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="667 469 877 496" data-label="Section-Header">Watching videos</div> <div data-bbox="667 505 1793 561" data-label="Text"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="667 592 1740 649" data-label="Text"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <div data-bbox="562 712 1031 747" data-label="Text"> <p>http://support.apple.com/kb/HT1304</p> </div> <div data-bbox="951 815 1094 854" data-label="Section-Header">Movies.</div> <div data-bbox="951 855 1528 899" data-label="Text"> <p>Now showing on all your screens.</p> </div> <div data-bbox="951 922 1499 1307" data-label="Text"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 20	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 233 1052 264">http://www.apple.com/itunes/features/</p> <div data-bbox="562 302 1866 1130"> <p data-bbox="604 331 1442 418">iTunes Store: Movie rental usage rights in the United States</p> <p data-bbox="1677 339 1839 365">Languages Engli</p> <p data-bbox="604 444 1766 506">You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p data-bbox="604 579 1220 605">The iTunes Store movie rental usage rules are as follows:</p> <ul data-bbox="621 643 1829 1084" style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <p data-bbox="562 1170 1010 1201">http://support.apple.com/kb/ht1415</p> <div data-bbox="604 1239 1877 1382"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div>

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Claim 20	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE
Claim 21	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, wherein the rendering device and the repository are integrated into a secure system having a secure boundary.	<p>On information and belief, the Apple Accused Instrumentalities comprise a rendering device and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that are integrated into a secure system having a secure boundary.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>
Claim 24	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, further comprising means for communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the rendering system (Apple Accused Instrumentalities) comprises a means for communicating with the master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the computing elements, software, and/or circuitry that perform the communication with the master repository for obtaining an identification certificate for the repository.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
<p>A computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content, and operative to render content in accordance with usage rights associated with the content, said computer readable instructions configured to cause one or more computer processors to perform the steps of:</p>	<p>Apple's Accused Instrumentalities that support the iTunes application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities") Each of the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content and operative to render content in accordance with usage rights associated with the content.(See below).²</p> <p>Specifically, each of these Apple Accused Instrumentalities configured to activate the iTunes application ("iTunes App"), which is available on any Device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>

² These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="661 237 1808 865"> <div> <p>TV Shows. Tune in to your favorites anytime—and anywhere—you want.</p> <p>iTunes brings you more than 250,000 TV shows commercial-free² — many in 1080p HD.³ Buy individual episodes or a full season. With Season Pass, you can even buy a full season before it airs. And with Complete My Season, you can buy an episode or two to check out a show, then get the whole season for the original price minus what you've already paid. Whether you buy on your Mac, PC, or iOS device, TV shows are instantly accessible in your iTunes library, where you can play them or download a copy to take with you. Perfect for when you're traveling and won't have Wi-Fi.</p> </div> <div> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> </div> <p>https://www.apple.com/itunes/features/</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
configuring a rendering	Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the

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Claim 58	Apple Accused Products (iTunes Videos)
device to render the content;	<p>content.</p> <p>For example, the Apple Accused Instrumentalities is configured to render the video which is rented or purchased from iTunes Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="953 228 1518 828"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <p data-bbox="558 867 1050 899">http://www.apple.com/itunes/features/</p>
configuring a distributed repository coupled to said rendering device to include a requester mode of operation and server mode of operation;	<p data-bbox="558 943 1913 1084">Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to the rendering device and configured to include a requester mode of operation and server mode of operation.</p> <p data-bbox="558 1125 1913 1230">The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iTunes Videos app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p data-bbox="558 1271 1913 1344">The Apple Accused iOS devices running the iTunes Videos app take steps to enforce behavioral integrity.</p> <p data-bbox="558 1385 1913 1412">For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>signed using a digital certificate. The digital certificate is checked during installation and update of iTunes Videos App. Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="695 375 1776 1187" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the iTunes Videos app take steps to enforce communication integrity.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the client is a trusted entity.</p> <div data-bbox="688 412 1782 730" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>SSL, TLS</p> <p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="617 841 1852 1390" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p>This message conveys the server's certificate chain to the client.</p> <p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p data-bbox="558 233 1157 264">http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p data-bbox="558 305 1881 339">The Apple Accused iOS devices running the iTunes Videos app take steps to enforce physical integrity.</p> <p data-bbox="558 380 1835 448">For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>



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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="831 240 1423 375"> <h2>Encryption and Data Protection</h2> </div> <div data-bbox="831 513 1625 716"> <p>The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p> </div> <div data-bbox="831 769 1171 797"> <h3>Hardware Security Features</h3> </div> <div data-bbox="831 816 1612 898"> <p>On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p> </div> <div data-bbox="831 919 1600 1032"> <p>Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p> </div> <div data-bbox="831 1052 1633 1312"> <p>The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p> </div> <div data-bbox="558 1369 1444 1398"> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="598 240 1873 738" style="border: 1px solid black; padding: 10px;"> <p data-bbox="611 245 1062 266">USE OF PURCHASED OR RENTED CONTENT</p> <p data-bbox="611 310 1864 716">You agree that the iTunes Service and certain iTunes Products include security technology that limits your use of iTunes Products and that, whether or not iTunes Products are limited by security technology, you shall use iTunes Products in compliance with the applicable usage rules established by Apple and its licensors ("Usage Rules"), and that any other use of the iTunes Products may constitute a copyright infringement. Any security technology is an inseparable part of the iTunes Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the iTunes Service by any means other than through software that is provided by Apple for accessing the iTunes Service. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the iTunes Service. Violations of system or network security may result in civil or criminal liability.</p> </div> <p data-bbox="562 781 1554 808">http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p data-bbox="562 854 1906 1029">For example, when the user attempts to use any of the Apple Accused Instrumentalities to download a rented or purchased video, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iTunes Store) for access to the content.</p> <p data-bbox="562 1075 1858 1250">Further, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and plays the video according to the usage rights associated with the video.</p> <p data-bbox="562 1295 1854 1395">Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="562 266 1898 310"> <h2>Download past purchases Languages English</h2> </div> <div data-bbox="562 336 1864 402"> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> </div> <div data-bbox="562 479 810 511"> <p>Before you begin</p> </div> <div data-bbox="573 534 1869 714"> <ol style="list-style-type: none"> 1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item. 2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country. </div> <div data-bbox="554 777 1033 813"> <p>http://support.apple.com/kb/HT2519</p> </div> <div data-bbox="693 865 1241 901"> <p>Movies, TV shows, or music videos</p> </div> <div data-bbox="711 906 1661 1029"> <ol style="list-style-type: none"> 1. Tap Settings > Videos and make sure Show All Videos is on. 2. Tap the Videos app. 3. Tap Movies, Music Videos, or TV Shows at the bottom of the page. </div> <div data-bbox="758 1052 1232 1123">  </div> <div data-bbox="711 1161 1325 1247"> <ol style="list-style-type: none"> 4. Find the item that you want to download. 5. Tap the Download  icon. </div> <div data-bbox="554 1326 1033 1364"> <p>http://support.apple.com/kb/HT2519</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="970 297 1503 381"> <p>Movies. Now showing on all your screens.</p> </div> <div data-bbox="970 406 1478 795"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <div data-bbox="554 901 1052 933"> <p>http://www.apple.com/itunes/features/</p> </div> <div data-bbox="657 992 1031 1024"> <p>Browsing and buying videos</p> </div> <div data-bbox="657 1027 1803 1183"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="657 1213 879 1243"> <p>Watching videos</p> </div> <div data-bbox="657 1247 1793 1307"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="657 1336 1743 1396"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	http://support.apple.com/kb/HT1304
<p>enforcing usage rights associated with the content and permitting the rendering device to render the content in accordance with a manner of use specified by the usage rights, when in the server mode of operation;</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="667 250 1026 277" data-label="Section-Header">Browsing and buying videos</div> <div data-bbox="667 285 1801 440" data-label="Text"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="667 469 877 496" data-label="Section-Header">Watching videos</div> <div data-bbox="667 505 1793 561" data-label="Text"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="667 594 1740 651" data-label="Text"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <div data-bbox="562 712 1031 747" data-label="Text"> <p>http://support.apple.com/kb/HT1304</p> </div> <div data-bbox="951 815 1094 854" data-label="Section-Header">Movies.</div> <div data-bbox="951 855 1528 899" data-label="Text"> <p>Now showing on all your screens.</p> </div> <div data-bbox="951 922 1499 1307" data-label="Text"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 233 1052 264">http://www.apple.com/itunes/features/</p> <div data-bbox="573 264 1898 829"><p data-bbox="625 297 1428 328">To rent movies from the iTunes Store on your computer</p><ol data-bbox="638 350 1377 451" style="list-style-type: none"><li data-bbox="638 350 1203 378">1. In iTunes on your computer, click iTunes Store.<li data-bbox="638 386 1234 414">2. In the iTunes Store, find a movie you want to rent.<li data-bbox="638 422 1377 451">3. Click Rent. Your rental should begin to download immediately.<p data-bbox="625 488 1850 553">Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p><ol data-bbox="638 591 1591 727" style="list-style-type: none"><li data-bbox="638 591 1146 618">1. Connect the device and select it in iTunes.<li data-bbox="638 626 942 654">2. Click the Movies button.<li data-bbox="638 662 1098 690">3. Select the movie, and then click Move.<li data-bbox="638 698 1591 727">4. After all movies have been moved, click Apply in the lower-right corner of iTunes.<p data-bbox="625 764 1362 792">You must be connected to the Internet to transfer a rented movie.</p></div> <p data-bbox="562 870 1031 901">http://support.apple.com/kb/HT1390</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="625 256 1860 347"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="625 370 1787 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="625 505 1243 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="642 566 1852 1013"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="558 1092 1014 1127"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1179 1858 1304"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="558 1367 1556 1399"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>



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Claim 58	Apple Accused Products (iTunes Videos)
requesting access to content from another distributed repository, when in the requester mode of operation; and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a purchased or rented video (by tapping on the download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iTunes Store) for access to the content.</p> <div data-bbox="573 667 1896 1157" style="border: 1px solid black; padding: 10px;"> <p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> </div> <p>http://support.apple.com/kb/HT1491</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="617 254 1430 289"> <p>To rent movies from the iTunes Store on your computer</p> </div> <div data-bbox="634 310 1379 412"> <ol style="list-style-type: none"> 1. In iTunes on your computer, click iTunes Store. 2. In the iTunes Store, find a movie you want to rent. 3. Click Rent. Your rental should begin to download immediately. </div> <div data-bbox="617 448 1850 514"> <p>Once the rental is downloaded, you can watch it on your computer or transfer the rental to a supported iPod, iPhone, iPad, or Apple TV (1st generation):</p> </div> <div data-bbox="634 550 1593 690"> <ol style="list-style-type: none"> 1. Connect the device and select it in iTunes. 2. Click the Movies button. 3. Select the movie, and then click Move. 4. After all movies have been moved, click Apply in the lower-right corner of iTunes. </div> <div data-bbox="617 725 1365 753"> <p>You must be connected to the Internet to transfer a rented movie.</p> </div> <div data-bbox="554 829 1033 865"> <p>http://support.apple.com/kb/HT1390</p> </div> <div data-bbox="567 902 1081 950"> <p>Download past purchases</p> </div> <div data-bbox="1680 911 1887 938"> <p>Languages English</p> </div> <div data-bbox="567 971 1869 1040"> <p>With iTunes in the Cloud, you can access your past purchases from the iTunes Store, App Store, iBooks Store, and Mac App Store.</p> </div> <div data-bbox="567 1115 814 1149"> <p>Before you begin</p> </div> <div data-bbox="579 1172 1871 1352"> <ol style="list-style-type: none"> 1. Sign in with the Apple ID that you used for the original purchase. See which Apple ID you used to download an item. 2. See if the content is available for redownload. Previously purchased items might not be available if they're no longer on the iTunes Store. If you changed your Apple ID from one country to another, you can't download items you purchased in a previous country. </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p data-bbox="558 237 1031 264">http://support.apple.com/kb/HT2519</p> <div data-bbox="653 302 1818 743" style="border: 1px solid black; padding: 10px;"> <p data-bbox="701 321 1239 349">Movies, TV shows, or music videos</p> <ol data-bbox="722 362 1659 480" style="list-style-type: none"> <li data-bbox="722 362 1575 389">1. Tap Settings > Videos and make sure Show All Videos is on. <li data-bbox="722 402 1031 430">2. Tap the Videos app. <li data-bbox="722 443 1659 480">3. Tap Movies, Music Videos, or TV Shows at the bottom of the page. <div data-bbox="762 505 1239 578" style="border: 1px solid black; height: 45px; margin: 10px 0; text-align: center;">  </div> <ol data-bbox="722 618 1323 699" style="list-style-type: none"> <li data-bbox="722 618 1323 646">4. Find the item that you want to download. <li data-bbox="722 659 1129 699">5. Tap the Download  icon. </div> <p data-bbox="558 784 1031 812">http://support.apple.com/kb/HT2519</p>
<p>receiving by said distributed repository a request to render the content and permitting the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the rendering of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<p>information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="625 558 1845 1005" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="945 256 1533 755"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <div data-bbox="556 852 1052 889"> <p>http://www.apple.com/itunes/features/</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)
	<div data-bbox="625 256 1860 347"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="625 370 1787 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="625 505 1243 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="642 566 1852 1013"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="558 1092 1014 1127"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1179 1856 1304"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="558 1367 1556 1399"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>

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Claim 58	Apple Accused Products (iTunes Videos)

Claim 60	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein said repository comprises means for storing the content.	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 62	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 60, wherein said means for storing comprises means for storing content after rendering.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when the user downloads a purchased or rented video ((by tapping on the download icon displayed on the Apple Accused Instrumentality), it gets downloaded and is stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). User can view the video unlimited number of times within the 'Rental period' in case of rented videos and on information and belief, for purchased videos within the time period till which iTunes is entitled to provide the video to its</p>

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Claim 62	Apple Accused Products (iTunes Videos)
	<p>users.</p> <p>Further, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content after rendering.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div data-bbox="625 669 1845 1117" style="border: 1px solid black; padding: 10px;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 62	Apple Accused Products (iTunes Videos)
	<div data-bbox="945 258 1530 751"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <div data-bbox="552 852 1054 888"> <p>http://www.apple.com/itunes/features/</p> </div>

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Claim 62	Apple Accused Products (iTunes Videos)
	<div data-bbox="604 256 1839 347"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="604 370 1766 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="604 505 1220 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="621 568 1829 1013"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="562 1094 1010 1127"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1180 1856 1305"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="562 1370 1551 1403"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>

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Claim 65	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 62, wherein the content comprises video.	<p data-bbox="556 311 1911 415">Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content comprising video.</p> <p data-bbox="556 454 1806 526">For example, the content provided by the iTunes Store are videos for rent/ purchase which can be rendered on the Apple Accused Instrumentalities.</p> <div data-bbox="924 558 1547 1149" style="border: 1px solid black; padding: 10px; margin: 10px auto; width: 60%;"> <p data-bbox="953 591 1526 675">Movies. Now showing on all your screens.</p> <p data-bbox="953 701 1499 1084">Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <p data-bbox="556 1188 1050 1221">http://www.apple.com/itunes/features/</p>

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Claim 65	Apple Accused Products (iTunes Videos)
	<p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> <hr/> <p>http://support.apple.com/kb/HT1491</p>
Claim 69	Apple Accused Products (iTunes Videos)
<p>A computer readable medium as recited in claim 58, wherein said rendering device comprises a video system.</p>	<p>Each of the Apple Accused Instrumentalities comprises a rendering device that comprises a video system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a rendering device that can play (render) movies and TV shows and thus comprise a video system.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

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Claim 69	Apple Accused Products (iTunes Videos)
	<div data-bbox="953 261 1526 753"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <p data-bbox="560 857 1050 889">http://www.apple.com/itunes/features/</p> <div data-bbox="569 927 1892 1406"> <p>Videos</p> <p>You can purchase movies and TV shows in standard (480p) or high-definition (720p or 1080p) format:</p> <ul style="list-style-type: none"> ▪ When you purchase a high definition (HD) video, a standard definition (SD) version compatible with iPod and iPhone also downloads. ▪ If you purchase an HD video using iPhone 4 or later, iPad, or iPod touch (4th generation), the HD version will download directly to your device and the SD version will appear in iTunes on your computer in the Downloads queue. ▪ With older devices, only the SD version will download on the device, and the HD version will appear in iTunes on your computer. <p>Rented movies are available in standard and high-definition. Rentals won't start playing until completely downloaded. Learn more about rentals.</p> </div>

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Claim 69	Apple Accused Products (iTunes Videos)
	http://support.apple.com/kb/HT1491
Claim 71	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iTunes App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>
Claim 72	Apple Accused Products (iTunes Videos)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be rendered (e.g., executed) on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permits the rendering of the video within the</p>

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Claim 72	Apple Accused Products (iTunes Videos)
	<p>expiry time of the video. In case of rented videos, the expiry time is the ‘Rental Period’ and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality’s repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="625 597 1845 1044" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Browsing and buying videos</p> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> <p>Watching videos</p> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <p>http://support.apple.com/kb/HT1304</p>

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Claim 72	Apple Accused Products (iTunes Videos)
	<div data-bbox="945 259 1533 755"> <p>Movies. Now showing on all your screens.</p> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div> <div data-bbox="556 852 1050 889"> http://www.apple.com/itunes/features/ </div>

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Claim 72	Apple Accused Products (iTunes Videos)
	<div data-bbox="604 256 1839 347"> <p>iTunes Store: Movie rental usage rights in the United States Languages Engli</p> </div> <div data-bbox="604 370 1766 435"> <p>You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> </div> <div data-bbox="604 505 1220 532"> <p>The iTunes Store movie rental usage rules are as follows:</p> </div> <div data-bbox="621 568 1833 1013"> <ul style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <div data-bbox="560 1094 1012 1127"> <p>http://support.apple.com/kb/ht1415</p> </div> <div data-bbox="604 1179 1858 1304"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div> <div data-bbox="560 1369 1554 1401"> <p>http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> </div>

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Claim 75	Apple Accused Products (iTunes Videos)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be displayed on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the displaying of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the displaying accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not displayed on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 75	Apple Accused Products (iTunes Videos)
	<div data-bbox="667 250 1026 277" data-label="Section-Header">Browsing and buying videos</div> <div data-bbox="667 285 1801 440" data-label="Text"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="667 469 877 496" data-label="Section-Header">Watching videos</div> <div data-bbox="667 505 1793 561" data-label="Text"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="667 592 1740 649" data-label="Text"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <div data-bbox="562 712 1031 747" data-label="Text"> <p>http://support.apple.com/kb/HT1304</p> </div> <div data-bbox="951 815 1094 854" data-label="Section-Header">Movies.</div> <div data-bbox="951 855 1528 899" data-label="Text"> <p>Now showing on all your screens.</p> </div> <div data-bbox="951 922 1499 1307" data-label="Text"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 75	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 233 1052 264">http://www.apple.com/itunes/features/</p> <div data-bbox="562 302 1866 1130"> <p data-bbox="604 331 1442 418">iTunes Store: Movie rental usage rights in the United States</p> <p data-bbox="1677 339 1839 365">Languages Engli</p> <p data-bbox="604 444 1766 506">You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p data-bbox="604 579 1220 605">The iTunes Store movie rental usage rules are as follows:</p> <ul data-bbox="621 643 1829 1084" style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <p data-bbox="562 1170 1010 1201">http://support.apple.com/kb/ht1415</p> <div data-bbox="604 1239 1877 1382"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div>

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Claim 75	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE
Claim 76	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein the manner of use is a manner of playing.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>For example, when the user requests to play a previously downloaded video on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the video and verifies if the user can still view the video. The usage rights specify the manner of use in which the video can be played on the Apple Accused Instrumentality.</p> <p>For example, the usage rights specifying the manner of use permit the playing of the video within the expiry time of the video. In case of rented videos, the expiry time is the 'Rental Period' and on information and belief, for purchased videos the expiry time is the time period till which iTunes is entitled to provide the video to its users. Based on the expiry time, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the playing accordingly.</p> <p>Thus, in case of expiry of the 'Rental period' the video is not played on the rendering device.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 76	Apple Accused Products (iTunes Videos)
	<div data-bbox="667 250 1026 279" data-label="Section-Header">Browsing and buying videos</div> <div data-bbox="667 285 1801 440" data-label="Text"> <p>To buy and play purchased videos, you need iTunes 7 or later. To see what videos are available in the iTunes Store, click iTunes Store on the left side of the iTunes window. Then click the Music Videos, TV Shows, or Movies link and start browsing. When you find a video that you'd like to purchase, click the Buy Video button next to it (or Buy Movie or Buy Episode). Some videos are also available as part of an album or other offer. Purchased videos appear in the appropriate playlist (Movies, TV Shows, or Music Videos) on the left side of the iTunes window.</p> </div> <div data-bbox="667 469 877 498" data-label="Section-Header">Watching videos</div> <div data-bbox="667 505 1793 561" data-label="Text"> <p>To watch a purchased video, double-click the file in your library or in the appropriate playlist, just as you do with music. By default, the movie plays in the iTunes window.</p> </div> <div data-bbox="667 592 1740 649" data-label="Text"> <p>You can also change the video playback's default location so that videos play in a separate window or at full screen all the time. To do this:</p> </div> <div data-bbox="562 712 1031 747" data-label="Text"> <p>http://support.apple.com/kb/HT1304</p> </div> <div data-bbox="953 816 1092 854" data-label="Section-Header">Movies.</div> <div data-bbox="953 857 1528 899" data-label="Text"> <p>Now showing on all your screens.</p> </div> <div data-bbox="953 922 1499 1307" data-label="Text"> <p>Browse more than 65,000 comedies, romances, classics, indies, and thrillers.² iTunes has movies from every major Hollywood studio. And you can buy or rent them in up to 1080p HD.³ Purchase on any device, and your movie will be instantly accessible in your iTunes library on your Mac or PC. Double-click to play, or download to keep a copy with you when you won't have Wi-Fi. You can also watch on your HDTV via Apple TV.</p> </div>

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Claim 76	Apple Accused Products (iTunes Videos)
	<p data-bbox="562 235 1052 264">http://www.apple.com/itunes/features/</p> <div data-bbox="562 302 1866 1130"> <p data-bbox="604 332 1442 418">iTunes Store: Movie rental usage rights in the United States</p> <p data-bbox="1677 342 1839 367">Languages Engli</p> <p data-bbox="604 446 1766 508">You can rent movies from the iTunes Store and watch them with your Mac or Windows computer, iPhone, iPad, video-enabled iPod*, or on your TV using Apple TV.</p> <p data-bbox="604 581 1220 605">The iTunes Store movie rental usage rules are as follows:</p> <ul data-bbox="621 646 1829 1089" style="list-style-type: none"> ▪ You have 30 days to begin watching the movie after the download completes. You can start watching the movie rental while it is still downloading. ▪ Once you've started to watch the rental, you have 24 hours to finish watching the movie (even if you start watching before the download is complete). You can watch the rental as many times as you want within this 24-hour period. ▪ The rental will expire when either the 30 day or 24-hour limit is reached. Once the rental expires, the rental is automatically deleted. You must rent and download the movie again to view it after your rental has expired. ▪ You can move the rental between devices as many times as you wish during the rental period. However, the movie can only be played on one device at a time. If you rent a movie on an iPhone, iPad, iPod touch, or Apple TV, it is not transferable to any other device and you must watch it on that device. ▪ On your device, the time remaining for you to finish watching the movie appears near the movie title. ▪ You can only play your rented movies on the computer you rented it from and only if it is authorized to play your iTunes Store purchases and rentals. </div> <p data-bbox="562 1170 1010 1200">http://support.apple.com/kb/ht1415</p> <div data-bbox="604 1240 1877 1382"> <p>You acknowledge that, because some aspects of the iTunes Service, iTunes Products, and administration of the Usage Rules entails the ongoing involvement of Apple, if Apple changes any part of or discontinues the iTunes Service, which Apple may do at its election, you may not be able to use iTunes Products to the same extent as prior to such change or discontinuation, and that Apple shall have no liability to you in such case.</p> </div>

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Claim 76	Apple Accused Products (iTunes Videos)
	http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE

Claim 81	Apple Accused Products (iTunes Videos)
A computer readable medium as recited in claim 58, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for the repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

SECTION 2: Apple Accused Products – iBooks

Claim 1	Apple Accused Products (iBooks)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative	Apple's Accused Instrumentalities that support the iBooks application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities"). Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below). ³

³ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

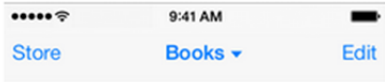

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Claim 1	Apple Accused Products (iBooks)
<p>to rendering content in accordance with usage rights associated with the content, said rendering system comprising:</p>	<p>For example, each of these Apple Accused Instrumentalities configured to activate the iBooks Application (“iBooks App”), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p> <div data-bbox="562 378 1883 828" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>Description</p> <p>iBooks is an amazing way to download and read books. iBooks includes the iBooks Store, where you can download the latest best-selling books or your favourite classics — day or night. Browse your library on a beautiful bookshelf, tap a book to open it, flip through pages with a swipe or a tap, and bookmark or add notes to your favourite passages.</p> <p>Download books</p> <ul style="list-style-type: none"> • Download best-sellers and classic books from the iBooks Store • Find fully illustrated books, including children's picture books, designed art books, photo books, cook books and more in the iBooks Store • Experience gorgeous full-screen Multi-Touch books filled with interactive features, diagrams, photos, videos and more • Read a free sample of any book on the iBooks Store before making it a part of your permanent collection </div> <p>https://itunes.apple.com/in/app/ibooks/id364709193?mt=8</p> <p>ContentGuard’s investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple’s products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple’s argument concerning non-infringement.</p>
<p>a rendering device configured to render the</p>	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p>

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Claim 1	Apple Accused Products (iBooks)
content; and	<p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is purchased from iBooks Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>▼ Buying and downloading books on your computer</p> <p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p> <ul style="list-style-type: none"> ▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices. ▪ Send it automatically from your computer to your iOS device. <p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p> <ul style="list-style-type: none"> ▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store. ▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store. </div> <p>http://support.apple.com/kb/ht4629</p>

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Claim 1	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>
a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that includes requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iBooks app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed using a digital certificate. The digital certificate is checked during installation and update of iBooks App.</p>

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Claim 1	Apple Accused Products (iBooks)
	<p data-bbox="535 233 1654 264">Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="682 305 1764 1117" style="border: 1px solid black; padding: 10px;"> <p data-bbox="695 321 995 358">App Code Signing</p> <p data-bbox="695 383 1755 691">Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p data-bbox="695 719 1755 1109">In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p data-bbox="535 1154 1417 1185">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p data-bbox="535 1263 1854 1294">The Apple Accused iOS devices running the iBooks app take steps to enforce communication integrity.</p> <p data-bbox="535 1339 1885 1404">For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the</p>

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Claim 1	Apple Accused Products (iBooks)
	<p>client is a trusted entity.</p> <div data-bbox="674 305 1770 621" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>SSL, TLS</p> <p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="604 730 1839 1279" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p style="padding-left: 40px;">The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p style="padding-left: 40px;">This message conveys the server's certificate chain to the client.</p> <p style="padding-left: 40px;">The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> </div> <p>http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce physical integrity.</p>

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Claim 1	Apple Accused Products (iBooks)
	For example, the content on device is protected using encryption, and the decryption keys are stored securely.

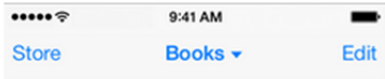

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Claim 1	Apple Accused Products (iBooks)
	<div data-bbox="806 230 1640 1328"> <h2 data-bbox="806 230 1640 386">Encryption and Data Protection</h2> <p data-bbox="806 516 1640 719">The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p> <h3 data-bbox="806 768 1640 800">Hardware Security Features</h3> <p data-bbox="806 816 1640 898">On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p> <p data-bbox="806 914 1640 1036">Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p> <p data-bbox="806 1052 1640 1320">The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p> </div> <p data-bbox="525 1369 1419 1398">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p>

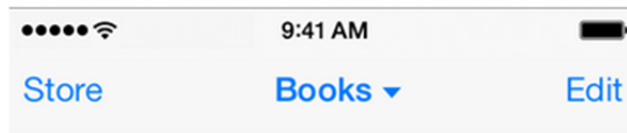
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Claim 1	Apple Accused Products (iBooks)
	<div data-bbox="579 240 1864 768" style="border: 1px solid black; padding: 10px;"> <p data-bbox="590 245 1335 269">USE OF APP AND BOOK PRODUCTS AND THE APP AND BOOK SERVICES</p> <p data-bbox="590 310 1854 748">You agree that the App and Book Services and certain App and Book Products include security technology that limits your use of App and Book Products and that, whether or not App and Book Products are limited by security technology, you shall use App and Book Products in compliance with the applicable usage rules established by Apple and its principals ("Usage Rules"), and that any other use of the App and Book Products may constitute a copyright infringement. Any security technology is an inseparable part of the App and Book Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the App and Book Services by any means other than through software that is provided by Apple for accessing the App and Book Services. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the App and Book Services. Violations of system or network security may result in civil or criminal liability.</p> </div> <p data-bbox="533 808 1528 841">http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p data-bbox="533 881 1871 1060">For example, when the user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iBooks Store) for access to the content.</p> <p data-bbox="533 1101 1898 1279">Further, when the user requests to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p data-bbox="533 1320 1829 1424">Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 1	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

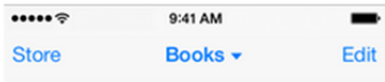

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Claim 1	Apple Accused Products (iBooks)
	<div data-bbox="766 261 894 303">Books</div> <div data-bbox="766 313 1673 358">Follow these steps to download purchased books:</div> <div data-bbox="787 418 1318 464">1. Tap iBooks and tap Store.</div> <div data-bbox="848 490 1470 621">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, Wi-Fi, and battery icons, and the time 9:41 AM. Below the status bar, there are three tabs: 'Store' (highlighted in blue), 'Books' (with a downward arrow), and 'Edit'.</div> <div data-bbox="787 670 1421 716">2. Scroll down and tap Purchased.</div> <div data-bbox="787 727 1598 774">3. Tap the book that you want to download.</div> <div data-bbox="527 888 1010 927">http://support.apple.com/kb/HT2519</div>

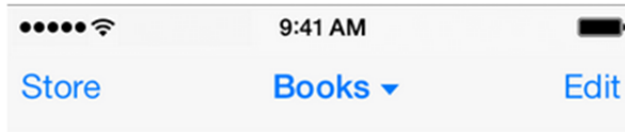
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>▼ Buying and downloading books on your computer</p> <p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p> <ul style="list-style-type: none"> ▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices. ▪ Send it automatically from your computer to your iOS device. <p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p> <ul style="list-style-type: none"> ▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store. ▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store. <p>http://support.apple.com/kb/ht4629</p>
<p>wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which</p>







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Claim 1	Apple Accused Products (iBooks)
	<p data-bbox="535 233 1890 487">maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p data-bbox="535 527 1890 633">Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="562 669 1883 1287" style="border: 1px solid black; padding: 10px;"> <p data-bbox="604 690 1318 717">▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p data-bbox="604 722 1843 787">To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol data-bbox="619 820 1218 885" style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button. <div data-bbox="653 901 1035 982" style="border: 1px solid black; padding: 5px; margin: 10px 0;">  </div> <ol data-bbox="619 1015 1816 1079" style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). <div data-bbox="653 1096 1035 1153" style="border: 1px solid black; padding: 5px; margin: 10px 0;">  </div> <ol data-bbox="619 1185 1690 1250" style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. </div> <p data-bbox="535 1323 987 1356">http://support.apple.com/kb/ht4629</p>

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Claim 1	Apple Accused Products (iBooks)
	<p data-bbox="774 266 890 302">Books</p> <p data-bbox="774 318 1667 358">Follow these steps to download purchased books:</p> <ol data-bbox="798 423 1314 464" style="list-style-type: none"> 1. Tap iBooks and tap Store. <div data-bbox="850 493 1470 623">  <p>The screenshot shows the top of the iBooks app. At the top, there are status icons (signal strength, Wi-Fi, and battery) and the time '9:41 AM'. Below the status bar, there are three buttons: 'Store' (highlighted in blue), 'Books' (with a dropdown arrow), and 'Edit'.</p> </div> <ol data-bbox="798 675 1591 773" style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p data-bbox="533 894 1003 927">http://support.apple.com/kb/HT2519</p> <div data-bbox="533 964 1890 1175"> <p data-bbox="567 984 1008 1013">▼ Can iBooks read books aloud?</p> <p data-bbox="567 1057 1885 1162">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> </div> <p data-bbox="533 1216 1003 1248">http://support.apple.com/kb/HT5557</p>

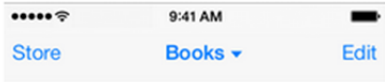

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Claim 1	Apple Accused Products (iBooks)						
	<div data-bbox="617 240 1877 506"> <table> <tr> <td>Delete a bookmark:</td><td>Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</td></tr> <tr> <td>Have a book read to you:</td><td>Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</td></tr> <tr> <td>View your library:</td><td>Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</td></tr> </table> </div> <div data-bbox="535 581 1018 613"> http://support.apple.com/kb/PH14768 </div> <div data-bbox="535 662 1898 898"> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p>http://support.apple.com/kb/HT5557</p> </div>	Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).	Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.	View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.
Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).						
Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.						
View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.						

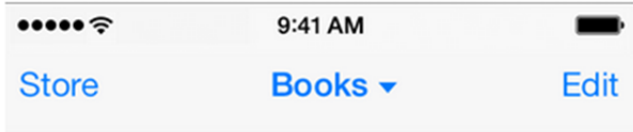
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Claim 1	Apple Accused Products (iBooks)
	<div data-bbox="554 230 1892 911"> <div data-bbox="554 230 1892 277"> <h1>iOS: Configuring accessibility features Languages <input type="text" value="Eng"/></h1> </div> <div data-bbox="554 298 1759 332"> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="554 407 1892 475"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="590 509 722 539"> <p>VoiceOver</p> </div> <div data-bbox="611 578 1625 609"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="590 630 669 657"> <p>Zoom</p> </div> <div data-bbox="611 696 1892 800"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="554 816 1220 847"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="590 867 1671 898"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> </div> <div data-bbox="525 946 1262 982"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>
<p>the requester mode of operation is operative to request access to content from another distributed repository, and</p>	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iBooks Store) for access to the content.</p>

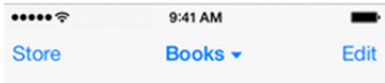
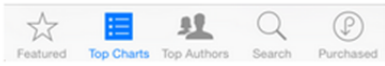
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

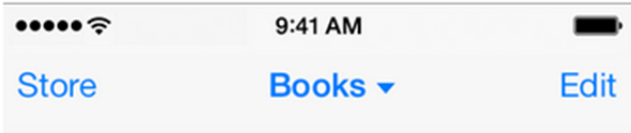
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none"> 1. Tap iBooks and tap Store.  <ol style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p>http://support.apple.com/kb/HT2519</p>
<p>said distributed repository is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p>







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Claim 1	Apple Accused Products (iBooks)
	<p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="562 743 1885 1360" style="border: 1px solid black; padding: 10px; margin-top: 20px;"> <p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. </div>

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Claim 1	Apple Accused Products (iBooks)
	<p data-bbox="533 235 989 264">http://support.apple.com/kb/ht4629</p> <div data-bbox="705 302 1740 911"> <p data-bbox="774 342 890 375">Books</p> <p data-bbox="774 394 1667 431">Follow these steps to download purchased books:</p> <ol data-bbox="800 500 1314 537" style="list-style-type: none"> <li data-bbox="800 500 1314 537">1. Tap iBooks and tap Store.  <ol data-bbox="800 751 1591 849" style="list-style-type: none"> <li data-bbox="800 751 1415 789">2. Scroll down and tap Purchased. <li data-bbox="800 808 1591 849">3. Tap the book that you want to download. </div> <p data-bbox="533 971 1003 1000">http://support.apple.com/kb/HT2519</p> <div data-bbox="537 1037 1906 1248"> <p data-bbox="569 1060 1008 1088">▼ Can iBooks read books aloud?</p> <p data-bbox="569 1133 1885 1235">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> </div> <p data-bbox="533 1292 1003 1321">http://support.apple.com/kb/HT5557</p>

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Claim 1	Apple Accused Products (iBooks)						
	<div data-bbox="617 237 1877 505"> <table> <tr> <td>Delete a bookmark:</td><td>Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</td></tr> <tr> <td>Have a book read to you:</td><td>Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</td></tr> <tr> <td>View your library:</td><td>Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</td></tr> </table> </div> <div data-bbox="533 578 1020 613"> http://support.apple.com/kb/PH14768 </div> <div data-bbox="564 662 1453 695"> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> </div> <div data-bbox="564 732 1900 800"> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> </div> <div data-bbox="533 862 1005 898"> http://support.apple.com/kb/HT5557 </div>	Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).	Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.	View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.
Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).						
Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.						
View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.						

Claim 1	Apple Accused Products (iBooks)
	<div data-bbox="562 237 1892 277"> <h2>iOS: Configuring accessibility features Languages Eng</h2> </div> <div data-bbox="562 305 1759 334"> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="562 410 1881 475"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="596 516 720 540"> <p>VoiceOver</p> </div> <div data-bbox="617 581 1623 610"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="596 634 669 659"> <p>Zoom</p> </div> <div data-bbox="617 699 1877 800"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="562 821 1218 850"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="596 873 1667 902"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> <div data-bbox="535 951 1260 984"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>

Claim 3	Apple Accused Products (iBooks)
<p>A rendering system as recited in claim 1, wherein said repository comprises means for storing the content.</p>	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p>

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Claim 3	Apple Accused Products (iBooks)
	<p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

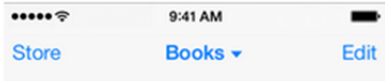

Claim 15	Apple Accused Products (iBooks)
<p>A rendering system as recited in claim 1 wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iBooks App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 16	Apple Accused Products (iBooks)
<p>A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered</p>

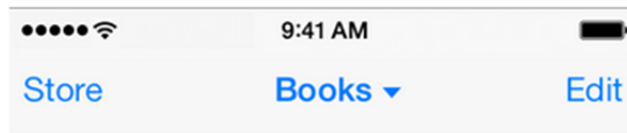
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Claim 16	Apple Accused Products (iBooks)
program only in a manner specified by the usage rights.	<p>(e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>



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Claim 16	Apple Accused Products (iBooks)
	<p data-bbox="606 251 1318 279">▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p data-bbox="606 284 1843 345">To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol data-bbox="621 383 1218 444" style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button. <div data-bbox="653 464 1035 544">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, time (9:41 AM), and battery level. Below the status bar, there are three buttons: 'Store' (highlighted in blue), 'Books' (with a dropdown arrow), and 'Edit'.</div> <ol data-bbox="621 573 1816 634" style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). <div data-bbox="653 654 1035 714">A screenshot of the iBooks app bottom navigation bar. It contains five icons: a star for 'Featured', a bookshelf for 'Top Charts', a person for 'Top Authors', a magnifying glass for 'Search', and a shopping bag for 'Purchased'. The 'Top Charts' icon is highlighted in blue.</div> <ol data-bbox="621 743 1694 805" style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p data-bbox="535 889 987 917">http://support.apple.com/kb/ht4629</p>

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Claim 16	Apple Accused Products (iBooks)
	<div data-bbox="766 261 894 302">Books</div> <div data-bbox="766 313 1673 357">Follow these steps to download purchased books:</div> <div data-bbox="787 418 1318 462">1. Tap iBooks and tap Store.</div> <div data-bbox="848 490 1470 621">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, Wi-Fi, and battery icons, and the time 9:41 AM. Below the status bar, there are three buttons: 'Store' (highlighted in blue), 'Books' (with a dropdown arrow), and 'Edit'.</div> <div data-bbox="787 670 1421 716">2. Scroll down and tap Purchased.</div> <div data-bbox="787 727 1598 773">3. Tap the book that you want to download.</div> <div data-bbox="527 888 1008 925">http://support.apple.com/kb/HT2519</div> <div data-bbox="560 977 1012 1011">▼ Can iBooks read books aloud?</div> <div data-bbox="560 1049 1890 1161">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</div> <div data-bbox="527 1209 1008 1247">http://support.apple.com/kb/HT5557</div>

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Claim 16	Apple Accused Products (iBooks)
	<div data-bbox="617 238 1843 302"> Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x). </div> <div data-bbox="617 323 1682 389"> Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature. </div> <div data-bbox="617 440 1633 505"> View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library. </div> <div data-bbox="533 579 1020 612"> http://support.apple.com/kb/PH14768 </div> <div data-bbox="564 664 1453 695"> ▼ Do books from the iBooks Store have any Accessibility features? </div> <div data-bbox="564 735 1898 800"> You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch. </div> <div data-bbox="533 865 1005 898"> http://support.apple.com/kb/HT5557 </div>

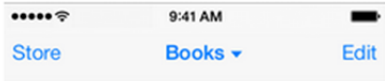

Claim 16	Apple Accused Products (iBooks)
	<div data-bbox="562 235 1898 911"> <div data-bbox="562 235 1898 284"> <h2>iOS: Configuring accessibility features Languages Eng</h2> <p data-bbox="562 305 1759 332">Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> <p data-bbox="562 410 1885 475">When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> <p data-bbox="596 516 722 544">VoiceOver</p> <ul data-bbox="617 581 1625 609" style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". <p data-bbox="596 633 672 660">Zoom</p> <ul data-bbox="617 698 1885 800" style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. <p data-bbox="562 820 1218 847">Managing accessibility features using your device</p> <p data-bbox="596 872 1667 899">Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> <p data-bbox="533 951 1260 979">http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>

Claim 19	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, wherein the manner of use is a manner of displaying.	<p data-bbox="533 1138 1906 1317">On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p data-bbox="533 1357 1890 1425">When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity</p>

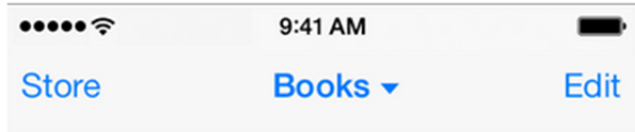
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Claim 19	Apple Accused Products (iBooks)
	<p>and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>







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Claim 19	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <p>3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).</p>  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

U.S. Patent No. 6,963,859

Claim 19	Apple Accused Products (iBooks)
	<p data-bbox="774 266 890 302">Books</p> <p data-bbox="774 318 1667 358">Follow these steps to download purchased books:</p> <ol data-bbox="795 423 1310 464" style="list-style-type: none"> 1. Tap iBooks and tap Store. <div data-bbox="850 495 1480 625">  <p>The screenshot shows the top of the iBooks app. At the top, there are status icons (signal strength, Wi-Fi, and battery) and the time '9:41 AM'. Below this is a navigation bar with three buttons: 'Store' (highlighted in blue), 'Books' (with a dropdown arrow), and 'Edit'.</p> </div> <ol data-bbox="795 675 1593 773" style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p data-bbox="533 894 1005 927">http://support.apple.com/kb/HT2519</p> <div data-bbox="533 964 1890 1175"> <p data-bbox="567 984 1008 1013">▼ Can iBooks read books aloud?</p> <p data-bbox="567 1057 1885 1162">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> </div> <p data-bbox="533 1216 1005 1248">http://support.apple.com/kb/HT5557</p>

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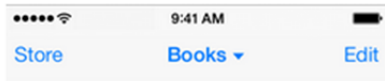

Claim 19	Apple Accused Products (iBooks)						
	<div data-bbox="617 237 1877 505"> <table> <tr> <td>Delete a bookmark:</td><td>Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</td></tr> <tr> <td>Have a book read to you:</td><td>Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</td></tr> <tr> <td>View your library:</td><td>Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</td></tr> </table> </div> <div data-bbox="533 578 1020 613">http://support.apple.com/kb/PH14768</div> <div data-bbox="562 662 1453 695">▼ Do books from the iBooks Store have any Accessibility features?</div> <div data-bbox="562 735 1898 800">You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</div> <div data-bbox="533 865 1005 901">http://support.apple.com/kb/HT5557</div>	Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).	Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.	View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.
Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).						
Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.						
View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.						

Claim 19	Apple Accused Products (iBooks)
	<div data-bbox="554 237 1890 911"> <div data-bbox="554 237 1890 277"> <h2>iOS: Configuring accessibility features Languages <input type="text" value="Eng"/></h2> </div> <div data-bbox="554 302 1759 334"> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="554 407 1890 475"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="590 513 720 540"> <p>VoiceOver</p> </div> <div data-bbox="611 581 1623 610"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="590 633 669 659"> <p>Zoom</p> </div> <div data-bbox="611 699 1890 800"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="554 820 1218 849"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="590 870 1669 899"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> </div> <div data-bbox="525 948 1262 984"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>
Claim 20	Apple Accused Products (iBooks)
<p>A rendering system as recited in claim 1, wherein the manner of use is a manner of playing.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and</p>

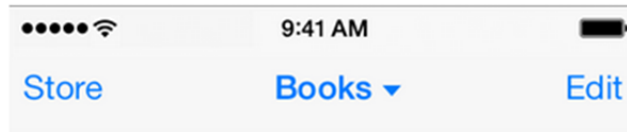
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Claim 20	Apple Accused Products (iBooks)
	<p>permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>







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Claim 20	Apple Accused Products (iBooks)
	<p data-bbox="606 251 1318 279">▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p data-bbox="606 284 1843 345">To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol data-bbox="621 383 1218 444" style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button. <div data-bbox="651 462 1033 542">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, time (9:41 AM), and battery level. Below the status bar, there are three buttons: 'Store' (highlighted in blue), 'Books' with a dropdown arrow, and 'Edit'.</div> <ol data-bbox="621 573 1816 634" style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). <div data-bbox="651 652 1033 712">A screenshot of the iBooks app bottom navigation bar. It contains five icons with labels below them: a star for 'Featured', a bookshelf for 'Top Charts', a person for 'Top Authors', a magnifying glass for 'Search', and a shopping bag for 'Purchased'.</div> <ol data-bbox="621 743 1694 805" style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p data-bbox="535 889 987 917">http://support.apple.com/kb/ht4629</p>

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Claim 20	Apple Accused Products (iBooks)
	<p data-bbox="772 266 890 305">Books</p> <p data-bbox="772 318 1667 360">Follow these steps to download purchased books:</p> <ol data-bbox="793 422 1314 464" style="list-style-type: none"> 1. Tap iBooks and tap Store. <div data-bbox="848 493 1470 623">  <p>The screenshot shows the top of the iBooks app. At the top, there are status icons (signal strength, Wi-Fi, and battery) and the time '9:41 AM'. Below this is a navigation bar with three buttons: 'Store' in blue, 'Books' in blue with a downward arrow, and 'Edit' in blue.</p> </div> <ol data-bbox="793 675 1591 776" style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p data-bbox="533 893 1003 925">http://support.apple.com/kb/HT2519</p> <div data-bbox="533 964 1890 1175"> <p data-bbox="567 984 1008 1013">▼ Can iBooks read books aloud?</p> <p data-bbox="567 1055 1885 1159">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> </div> <p data-bbox="533 1214 1003 1247">http://support.apple.com/kb/HT5557</p>

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Claim 20	Apple Accused Products (iBooks)						
	<table border="1"> <tr> <td data-bbox="617 238 806 302">Delete a bookmark:</td><td data-bbox="835 238 1843 302">Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</td></tr> <tr> <td data-bbox="617 326 806 389">Have a book read to you:</td><td data-bbox="835 326 1843 389">Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</td></tr> <tr> <td data-bbox="617 443 806 506">View your library:</td><td data-bbox="835 443 1843 506">Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</td></tr> </table> <p data-bbox="533 581 1020 613">http://support.apple.com/kb/PH14768</p> <p data-bbox="567 667 1451 699">▼ Do books from the iBooks Store have any Accessibility features?</p> <p data-bbox="567 737 1898 800">You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p data-bbox="533 867 1003 899">http://support.apple.com/kb/HT5557</p>	Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).	Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.	View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.
Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).						
Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.						
View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.						

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Claim 20	Apple Accused Products (iBooks)
	<div data-bbox="562 235 1892 277"> <h2>iOS: Configuring accessibility features Languages Eng</h2> </div> <div data-bbox="562 302 1759 334"> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="562 407 1881 475"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="596 513 720 540"> <p>VoiceOver</p> </div> <div data-bbox="617 579 1623 610"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="596 633 669 660"> <p>Zoom</p> </div> <div data-bbox="617 699 1881 800"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="562 820 1218 849"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="596 870 1667 899"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> <div data-bbox="533 950 1260 982"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>
Claim 21	Apple Accused Products (iBooks)
<p>A rendering system as recited in claim 1, wherein the rendering device and the repository are integrated into a secure system having a secure boundary.</p>	<p>On information and belief, the Apple Accused Instrumentalities comprise a rendering device and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that are integrated into a secure system having a secure boundary.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 24	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, further comprising means for communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the rendering system (Apple Accused Instrumentalities) comprises a means for communicating with the master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the computing elements, software, and/or circuitry that perform the communication with the master repository for obtaining an identification certificate for the repository.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (iBooks)
A computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use	<p>Apple's Accused Instrumentalities that support the iBooks application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities"). Each of the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content and operative to render content in accordance with usage rights associated with the content. (See below).⁴</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the iBooks Application</p>

⁴ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

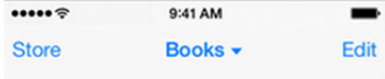

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Claim 58	Apple Accused Products (iBooks)
<p>of content, and operative to render content in accordance with usage rights associated with the content, said computer readable instructions configured to cause one or more computer processors to perform the steps of:</p>	<p>(“iBooks App”), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p> <div data-bbox="562 305 1881 753" style="border: 1px solid black; padding: 10px;"> <p>Description</p> <p>iBooks is an amazing way to download and read books. iBooks includes the iBooks Store, where you can download the latest best-selling books or your favourite classics — day or night. Browse your library on a beautiful bookshelf, tap a book to open it, flip through pages with a swipe or a tap, and bookmark or add notes to your favourite passages.</p> <p>Download books</p> <ul style="list-style-type: none"> • Download best-sellers and classic books from the iBooks Store • Find fully illustrated books, including children's picture books, designed art books, photo books, cook books and more in the iBooks Store • Experience gorgeous full-screen Multi-Touch books filled with interactive features, diagrams, photos, videos and more • Read a free sample of any book on the iBooks Store before making it a part of your permanent collection </div> <p>https://itunes.apple.com/in/app/ibooks/id364709193?mt=8</p> <p>ContentGuard’s investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple’s products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple’s argument concerning non-infringement.</p>
<p>configuring a rendering device to render the content;</p>	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p> <p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is</p>

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Claim 58	Apple Accused Products (iBooks)
	<p>purchased from iBooks Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p> <div data-bbox="562 451 1885 1003" style="border: 1px solid black; padding: 10px;"> <p>▼ Buying and downloading books on your computer</p> <p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p> <ul style="list-style-type: none"> ▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices. ▪ Send it automatically from your computer to your iOS device. <p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p> <ul style="list-style-type: none"> ▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store. ▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store. </div> <p>http://support.apple.com/kb/ht4629</p>

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Claim 58	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>
configuring a distributed repository coupled to said rendering device to include a requester mode of operation and server mode of operation;	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to a rendering device and configures to include a requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the iBooks app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed</p>

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Claim 58	Apple Accused Products (iBooks)
	<p>using a digital certificate. The digital certificate is checked during installation and update of iBooks App. Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="682 337 1764 1149" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce communication integrity.</p> <p>For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the</p>

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Claim 58	Apple Accused Products (iBooks)
	<p>client is a trusted entity.</p> <div data-bbox="674 305 1770 621" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>SSL, TLS</p> <p>iOS supports Secure Socket Layer (SSL v3) as well as Transport Layer Security (TLS v1.0, TLS v1.1, TLS v1.2) and DTLS. Safari, Calendar, Mail, and other Internet applications automatically use these mechanisms to enable an encrypted communication channel between the device and network services. High-level APIs (such as CFNetwork) make it easy for developers to adopt TLS in their apps, while low-level APIs (SecureTransport) provide fine-grained control.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <div data-bbox="604 730 1841 1279" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>7.4.2. Server Certificate</p> <p>When this message will be sent:</p> <p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p> <p>Meaning of this message:</p> <p>This message conveys the server's certificate chain to the client.</p> <p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p> </div> <p>http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused iOS devices running the iBooks app take steps to enforce physical integrity.</p>

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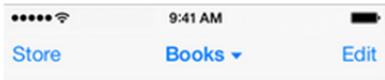

Claim 58	Apple Accused Products (iBooks)
	For example, the content on device is protected using encryption, and the decryption keys are stored securely.

Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="806 230 1640 1328"><h2 data-bbox="821 245 1409 375">Encryption and Data Protection</h2><p data-bbox="821 516 1612 716">The secure boot chain, code signing, and runtime process security all help to ensure that only trusted code and apps can run on a device. iOS has additional encryption and data protection features to safeguard user data, even in cases where other parts of the security infrastructure have been compromised (for example, on a device with unauthorized modifications). This provides important benefits for both users and IT administrators, protecting personal and corporate information at all times and providing methods for instant and complete remote wipe in the case of device theft or loss.</p><h3 data-bbox="821 773 1157 800">Hardware Security Features</h3><p data-bbox="821 818 1598 899">On mobile devices, speed and power efficiency are critical. Cryptographic operations are complex and can introduce performance or battery life problems if not designed and implemented with these priorities in mind.</p><p data-bbox="821 922 1587 1036">Every iOS device has a dedicated AES 256 crypto engine built into the DMA path between the flash storage and main system memory, making file encryption highly efficient. Along with the AES engine, SHA-1 is implemented in hardware, further reducing cryptographic operation overhead.</p><p data-bbox="821 1057 1619 1317">The device's unique ID (UID) and a device group ID (GID) are AES 256-bit keys fused into the application processor during manufacturing. No software or firmware can read them directly; they can see only the results of encryption or decryption operations performed using them. The UID is unique to each device and is not recorded by Apple or any of its suppliers. The GID is common to all processors in a class of devices (for example, all devices using the Apple A7 chip), and is used as an additional level of protection when delivering system software during installation and restore. Integrating these keys into the silicon helps prevent them from being tampered with or bypassed, or accessed outside the AES engine.</p></div> <p data-bbox="533 1370 1419 1398">http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p>

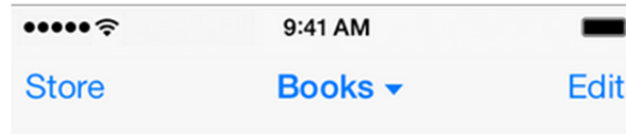
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Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="583 241 1864 768" style="border: 1px solid black; padding: 10px;"> <p data-bbox="592 248 1335 269">USE OF APP AND BOOK PRODUCTS AND THE APP AND BOOK SERVICES</p> <p data-bbox="592 311 1856 751">You agree that the App and Book Services and certain App and Book Products include security technology that limits your use of App and Book Products and that, whether or not App and Book Products are limited by security technology, you shall use App and Book Products in compliance with the applicable usage rules established by Apple and its principals ("Usage Rules"), and that any other use of the App and Book Products may constitute a copyright infringement. Any security technology is an inseparable part of the App and Book Products. Apple reserves the right to modify the Usage Rules at any time. You agree not to violate, circumvent, reverse-engineer, decompile, disassemble, or otherwise tamper with any of the security technology related to such Usage Rules for any reason—or to attempt or assist another person to do so. Usage Rules may be controlled and monitored by Apple for compliance purposes, and Apple reserves the right to enforce the Usage Rules without notice to you. You agree not to access the App and Book Services by any means other than through software that is provided by Apple for accessing the App and Book Services. You shall not access or attempt to access an Account that you are not authorized to access. You agree not to modify the software in any manner or form, or to use modified versions of the software, for any purposes including obtaining unauthorized access to the App and Book Services. Violations of system or network security may result in civil or criminal liability.</p> </div> <p data-bbox="537 808 1528 841">http://www.apple.com/legal/internet-services/itunes/us/terms.html#SERVICE</p> <p data-bbox="537 881 1871 1060">For example, when the user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (iBooks Store) for access to the content.</p> <p data-bbox="537 1101 1898 1279">Further, when the user requests to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p data-bbox="537 1320 1829 1424">Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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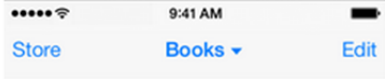

Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="604 289 1318 316"><p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p></div> <div data-bbox="604 321 1843 383"><p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p></div> <div data-bbox="621 418 1218 482"><ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.</div> <div data-bbox="653 500 1035 578">A screenshot of the top bar of the iBooks app. It features three buttons: 'Store' in blue, 'Books' in blue with a downward arrow, and 'Edit' in blue. Above the buttons, the status bar shows signal strength, the time '9:41 AM', and battery level.</div> <div data-bbox="621 609 1818 670"><ol style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).</div> <div data-bbox="653 690 1035 750">A screenshot of the bottom navigation bar of the iBooks app. It contains five icons with labels below them: a star for 'Featured', a bookshelf for 'Top Charts', a person for 'Top Authors', a magnifying glass for 'Search', and a circle with a 'P' for 'Purchased'.</div> <div data-bbox="621 776 1696 839"><ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf.</div> <div data-bbox="533 922 989 954"><p>http://support.apple.com/kb/ht4629</p></div>

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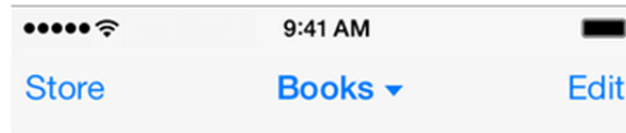
Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="764 264 894 306">Books</div> <div data-bbox="764 315 1675 363">Follow these steps to download purchased books:</div> <div data-bbox="787 420 1318 467">1. Tap iBooks and tap Store.</div> <div data-bbox="846 493 1467 625">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, Wi-Fi, and battery icons, and the time 9:41 AM. Below the status bar, there are three tabs: 'Store' (highlighted in blue), 'Books' (with a downward arrow), and 'Edit'.</div> <div data-bbox="787 672 1421 719">2. Scroll down and tap Purchased.</div> <div data-bbox="787 729 1598 777">3. Tap the book that you want to download.</div> <div data-bbox="525 889 1010 928">http://support.apple.com/kb/HT2519</div>

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Claim 58	Apple Accused Products (iBooks)
	<p>▼ Buying and downloading books on your computer</p> <p>When you find a book you like, you can purchase the book. On a Mac using OS X Mavericks, your books download to iBooks for Mac 1.0. If you want to send a book to your iOS device, use one of these methods:</p> <ul style="list-style-type: none"> ▪ Sync it from your iTunes library to an iOS device. On a Mac using OS X Mavericks, you can also use iTunes to sync your iBooks Library to your iOS devices. ▪ Send it automatically from your computer to your iOS device. <p>If you're using Windows or an OS X earlier than Mavericks, you can click Get Sample in iTunes to download the sample to iBooks on your compatible iOS device where you're signed in to the iTunes Store. If you're using iTunes on OS X Mavericks or later, click Get Sample in iTunes. A dialog will appear that lets you choose one of these options:</p> <ul style="list-style-type: none"> ▪ Click Send to Devices to send the sample to the iOS devices where you're signed in to the Store. ▪ Click Go to iBooks to show the book in the iBooks Store and download the sample to your Mac from the iBooks Store. <p>http://support.apple.com/kb/ht4629</p>
<p>enforcing usage rights associated with the content and permitting the rendering device to render the content in accordance with a manner of use specified by the usage rights, when in the server mode of operation;</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which</p>

Claim 58	Apple Accused Products (iBooks)
	<p>maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="562 667 1883 1287" style="border: 1px solid black; padding: 10px;"> <p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <p>3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).</p>  <p>4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf.</p> </div> <p>http://support.apple.com/kb/ht4629</p>

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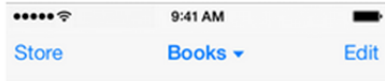
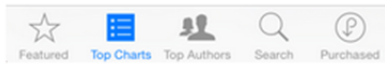
Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="764 302 892 341">Books</div> <div data-bbox="764 354 1673 397">Follow these steps to download purchased books:</div> <div data-bbox="787 457 1316 503">1. Tap iBooks and tap Store.</div> <div data-bbox="846 529 1467 660">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, Wi-Fi, and battery icons, and the time 9:41 AM. Below the status bar, there are three buttons: 'Store', 'Books' with a dropdown arrow, and 'Edit'.</div> <div data-bbox="787 709 1417 755">2. Scroll down and tap Purchased.</div> <div data-bbox="787 768 1596 812">3. Tap the book that you want to download.</div> <div data-bbox="525 925 1008 964">http://support.apple.com/kb/HT2519</div> <div data-bbox="558 1016 1012 1049">▼ Can iBooks read books aloud?</div> <div data-bbox="558 1088 1902 1200">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</div> <div data-bbox="525 1247 1008 1286">http://support.apple.com/kb/HT5557</div>

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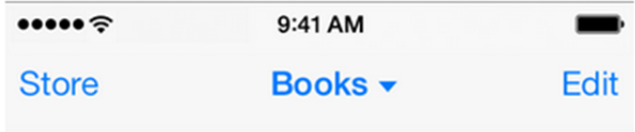
Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="617 237 1843 302"> <p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> </div> <div data-bbox="617 321 1682 391"> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> </div> <div data-bbox="617 440 1633 505"> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p> </div> <div data-bbox="533 578 1020 613"> <p>http://support.apple.com/kb/PH14768</p> </div> <div data-bbox="562 662 1453 695"> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> </div> <div data-bbox="562 735 1898 800"> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> </div> <div data-bbox="533 865 1003 898"> <p>http://support.apple.com/kb/HT5557</p> </div>

Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="562 235 1892 911"> <div data-bbox="562 235 1892 284"> <h1>iOS: Configuring accessibility features Languages <input type="text" value="Eng"/></h1> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="562 407 1892 475"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="598 513 720 540"> <p>VoiceOver</p> </div> <div data-bbox="617 579 1623 610"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="598 633 667 660"> <p>Zoom</p> </div> <div data-bbox="617 699 1892 800"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="562 820 1218 849"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="598 870 1667 899"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> </div> <div data-bbox="533 950 1260 982"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>
requesting access to content from another distributed repository, when in the requester mode of operation; and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (iBooks Store) for access to the content.</p>

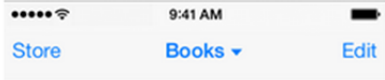

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Claim 58	Apple Accused Products (iBooks)
	<p data-bbox="606 253 1318 280">▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p data-bbox="606 285 1843 347">To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol data-bbox="621 386 1218 448" style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button. <div data-bbox="651 464 1033 544">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, the time 9:41 AM, and battery level. Below the status bar, there are three buttons: 'Store' (highlighted in blue), 'Books' with a dropdown arrow, and 'Edit'.</div> <ol data-bbox="621 574 1816 636" style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). <div data-bbox="651 652 1033 716">A screenshot of the iBooks app bottom navigation bar. It contains five icons with labels below them: a star for 'Featured', a bookshelf for 'Top Charts', a person for 'Top Authors', a magnifying glass for 'Search', and a shopping bag for 'Purchased'.</div> <ol data-bbox="621 743 1694 805" style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p data-bbox="535 889 987 917">http://support.apple.com/kb/ht4629</p>

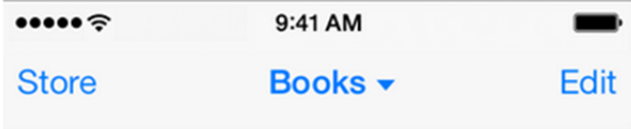
U.S. Patent No. 6,963,859

Claim 58	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none"> 1. Tap iBooks and tap Store.  <ol style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p>http://support.apple.com/kb/HT2519</p>
<p>receiving by said distributed repository a request to render the content and permitting the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p>







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Claim 58	Apple Accused Products (iBooks)
	<p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div data-bbox="562 743 1885 1360" style="border: 1px solid black; padding: 10px;"> <p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none"> 1. Open the iBooks app. 2. When your bookshelf appears, tap the Store button.  <ol style="list-style-type: none"> 3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).  <ol style="list-style-type: none"> 4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. </div>

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Claim 58	Apple Accused Products (iBooks)
	<p data-bbox="533 237 989 264">http://support.apple.com/kb/ht4629</p> <div data-bbox="705 337 1740 948"><p data-bbox="774 378 890 412">Books</p><p data-bbox="774 430 1667 467">Follow these steps to download purchased books:</p><ol data-bbox="800 532 1314 570" style="list-style-type: none">1. Tap iBooks and tap Store.<p data-bbox="800 789 1591 881">2. Scroll down and tap Purchased. 3. Tap the book that you want to download.</p></div> <p data-bbox="533 1005 1005 1032">http://support.apple.com/kb/HT2519</p> <div data-bbox="533 1073 1890 1284"><p data-bbox="569 1096 1010 1122">▼ Can iBooks read books aloud?</p><p data-bbox="569 1167 1885 1271">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p></div> <p data-bbox="533 1326 1005 1354">http://support.apple.com/kb/HT5557</p>

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Claim 58	Apple Accused Products (iBooks)						
	<table border="1"> <tr> <td data-bbox="617 238 806 302">Delete a bookmark:</td><td data-bbox="831 238 1843 302">Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</td></tr> <tr> <td data-bbox="617 326 806 389">Have a book read to you:</td><td data-bbox="831 326 1843 389">Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</td></tr> <tr> <td data-bbox="617 443 806 506">View your library:</td><td data-bbox="831 443 1843 506">Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</td></tr> </table> <p data-bbox="533 581 1016 613">http://support.apple.com/kb/PH14768</p> <p data-bbox="567 667 1451 699">▼ Do books from the iBooks Store have any Accessibility features?</p> <p data-bbox="567 737 1898 800">You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p data-bbox="533 867 1003 899">http://support.apple.com/kb/HT5557</p>	Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).	Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.	View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.
Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).						
Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.						
View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.						

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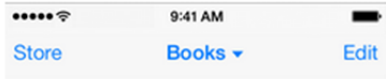

Claim 58	Apple Accused Products (iBooks)
	<div data-bbox="562 237 1892 277"> <h2>iOS: Configuring accessibility features Languages Eng</h2> </div> <div data-bbox="562 305 1759 334"> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="562 410 1881 475"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="596 514 720 540"> <p>VoiceOver</p> </div> <div data-bbox="617 581 1623 610"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="596 634 669 660"> <p>Zoom</p> </div> <div data-bbox="617 701 1877 800"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="562 821 1218 850"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="596 872 1667 901"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> <div data-bbox="535 951 1260 984"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>

Claim 60	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 58, wherein said repository comprises means for storing the content.</p>	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p>

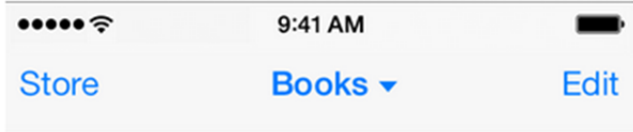
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Claim 60	Apple Accused Products (iBooks)
	<p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>
Claim 62	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 60, wherein said means for storing comprises means for storing content after rendering.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to purchase a book (by tapping the book displayed on the Apple Accused Instrumentality), it gets downloaded and stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). On information and belief, user can read the book unlimited number of times after it is stored in the Apple Accused Instrumentality's repository.</p> <p>Further, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content after rendering.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

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Claim 62	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <p>3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).</p>  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

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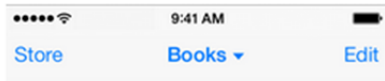

Claim 62	Apple Accused Products (iBooks)
	<p>Books</p> <p>Follow these steps to download purchased books:</p> <ol style="list-style-type: none"> 1. Tap iBooks and tap Store.  <ol style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p>http://support.apple.com/kb/HT2519</p>
Claim 71	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 58, wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a rendering device that comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the iBooks App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and</p>

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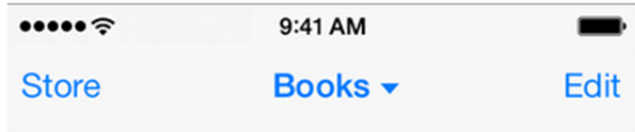
Claim 71	Apple Accused Products (iBooks)
	reviewed by ContentGuard.

Claim 72	Apple Accused Products (iBooks)
A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book , the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>



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Claim 72	Apple Accused Products (iBooks)
	<p data-bbox="606 251 1318 279">▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p data-bbox="606 284 1843 345">To browse the iBooks Store on your iOS device, you must install the iBooks app. You can <a data-bbox="1562 284 1843 311" href="#">download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol data-bbox="621 383 1218 444" style="list-style-type: none"><li data-bbox="621 383 888 410">1. Open the iBooks app.<li data-bbox="621 415 1218 444">2. When your bookshelf appears, tap the Store button. <div data-bbox="651 462 1033 542">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, time (9:41 AM), and battery level. Below the status bar, there are three buttons: 'Store' (highlighted in blue), 'Books' (with a dropdown arrow), and 'Edit'.</div> <ol data-bbox="621 573 1816 634" style="list-style-type: none"><li data-bbox="621 573 1816 634">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). <div data-bbox="651 652 1033 712">A screenshot of the iBooks app interface showing the bottom navigation bar. It contains five icons: a star for 'Featured', a bookshelf for 'Top Charts', a person for 'Top Authors', a magnifying glass for 'Search', and a shopping bag for 'Purchased'.</div> <ol data-bbox="621 743 1694 805" style="list-style-type: none"><li data-bbox="621 743 1694 805">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p data-bbox="535 889 987 917">http://support.apple.com/kb/ht4629</p>

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Claim 72	Apple Accused Products (iBooks)
	<p data-bbox="772 267 892 305">Books</p> <p data-bbox="772 321 1667 358">Follow these steps to download purchased books:</p> <ol data-bbox="795 423 1314 461" style="list-style-type: none"> 1. Tap iBooks and tap Store. <div data-bbox="850 495 1480 625">  <p>The screenshot shows the top of the iBooks app. At the top, there are status icons (signal strength, Wi-Fi, and battery) and the time '9:41 AM'. Below this is a navigation bar with three buttons: 'Store' in blue, 'Books' in blue with a downward arrow, and 'Edit' in blue.</p> </div> <ol data-bbox="795 678 1591 776" style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p data-bbox="533 894 1005 927">http://support.apple.com/kb/HT2519</p> <div data-bbox="533 964 1890 1175"> <p data-bbox="567 987 1008 1015">▼ Can iBooks read books aloud?</p> <p data-bbox="567 1057 1885 1162">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> </div> <p data-bbox="533 1219 1005 1252">http://support.apple.com/kb/HT5557</p>

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Claim 72	Apple Accused Products (iBooks)
	<div data-bbox="617 238 1843 302"> <p>Delete a bookmark: Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</p> </div> <div data-bbox="617 323 1682 389"> <p>Have a book read to you: Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</p> </div> <div data-bbox="617 440 1633 505"> <p>View your library: Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</p> </div> <div data-bbox="533 579 1020 612"> <p>http://support.apple.com/kb/PH14768</p> </div> <div data-bbox="562 664 1453 695"> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> </div> <div data-bbox="562 735 1898 800"> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> </div> <div data-bbox="533 865 1005 898"> <p>http://support.apple.com/kb/HT5557</p> </div>

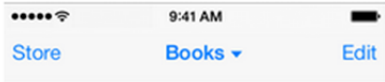
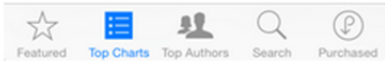
Claim 72	Apple Accused Products (iBooks)
	<div data-bbox="562 235 1890 909"> <div data-bbox="562 235 1890 284"> <h2>iOS: Configuring accessibility features Languages Eng</h2> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="562 406 1890 479"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="598 511 724 544"> <p>VoiceOver</p> </div> <div data-bbox="619 576 1627 609"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="598 633 672 665"> <p>Zoom</p> </div> <div data-bbox="619 698 1890 803"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="562 820 1218 852"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="598 868 1669 901"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> </div> <div data-bbox="535 950 1260 982"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>

Claim 75	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity</p>

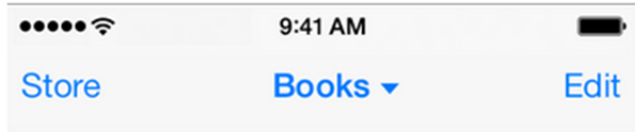
U.S. Patent No. 6,963,859

Claim 75	Apple Accused Products (iBooks)
	<p>and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>







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Claim 75	Apple Accused Products (iBooks)
	<p data-bbox="606 253 1318 280">▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p data-bbox="606 285 1843 347">To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol data-bbox="621 386 1218 448" style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button. <div data-bbox="653 464 1035 545">A screenshot of the iBooks app interface. At the top, there is a status bar with signal strength, time (9:41 AM), and battery level. Below the status bar, there are three buttons: 'Store' (highlighted in blue), 'Books' (with a dropdown arrow), and 'Edit'.</div> <ol data-bbox="621 574 1816 636" style="list-style-type: none">3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only). <div data-bbox="653 654 1035 716">A screenshot of the iBooks app interface showing the bottom navigation bar. It contains five icons: a star for 'Featured', a bookshelf for 'Top Charts', a person for 'Top Authors', a magnifying glass for 'Search', and a shopping bag for 'Purchased'.</div> <ol data-bbox="621 745 1694 807" style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p data-bbox="535 889 987 917">http://support.apple.com/kb/ht4629</p>

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Claim 75	Apple Accused Products (iBooks)
	<p data-bbox="774 266 890 303">Books</p> <p data-bbox="774 318 1667 358">Follow these steps to download purchased books:</p> <ol data-bbox="795 423 1314 464" style="list-style-type: none"> 1. Tap iBooks and tap Store. <div data-bbox="850 495 1480 625">  <p>The screenshot shows the top of the iBooks app. At the top, there are status icons (signal strength, Wi-Fi, and battery) and the time '9:41 AM'. Below this is a navigation bar with three buttons: 'Store' (highlighted in blue), 'Books' (with a dropdown arrow), and 'Edit'.</p> </div> <ol data-bbox="795 675 1593 773" style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p data-bbox="533 894 1005 927">http://support.apple.com/kb/HT2519</p> <div data-bbox="533 964 1890 1175"> <p data-bbox="567 984 1008 1013">▼ Can iBooks read books aloud?</p> <p data-bbox="567 1057 1885 1162">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> </div> <p data-bbox="533 1216 1005 1248">http://support.apple.com/kb/HT5557</p>

U.S. Patent No. 6,963,859

Claim 75	Apple Accused Products (iBooks)						
	<div data-bbox="617 237 1877 505"> <table> <tr> <td>Delete a bookmark:</td><td>Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</td></tr> <tr> <td>Have a book read to you:</td><td>Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</td></tr> <tr> <td>View your library:</td><td>Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</td></tr> </table> </div> <div data-bbox="533 578 1020 613"> http://support.apple.com/kb/PH14768 </div> <div data-bbox="564 662 1453 695"> <p>▼ Do books from the iBooks Store have any Accessibility features?</p> </div> <div data-bbox="564 732 1898 800"> <p>You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> </div> <div data-bbox="533 862 1005 898"> http://support.apple.com/kb/HT5557 </div>	Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).	Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.	View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.
Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).						
Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.						
View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.						

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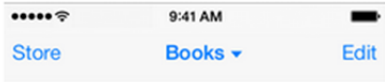

Claim 75	Apple Accused Products (iBooks)
	<div data-bbox="562 235 1890 909"> <div data-bbox="562 235 1890 284"> iOS: Configuring accessibility features Languages <input type="text" value="Eng"/> </div> <div data-bbox="562 300 1764 332"> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="562 406 1890 479"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="598 511 724 544"> <p>VoiceOver</p> </div> <div data-bbox="619 576 1627 609"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="598 633 672 665"> <p>Zoom</p> </div> <div data-bbox="619 698 1890 803"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="562 820 1218 852"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="598 868 1669 901"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> </div> <div data-bbox="535 950 1260 982"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>

Claim 76	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of playing.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity</p>

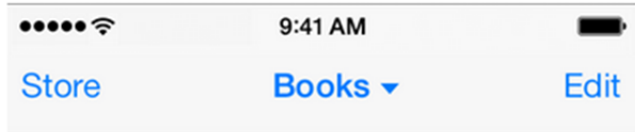
U.S. Patent No. 6,963,859

Claim 76	Apple Accused Products (iBooks)
	<p>and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality (Read Aloud feature is included in the book) or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Read Aloud feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>







U.S. Patent No. 6,963,859

Claim 76	Apple Accused Products (iBooks)
	<p>▼ Using iBooks Store on your iPhone, iPad, or iPod touch</p> <p>To browse the iBooks Store on your iOS device, you must install the iBooks app. You can download the iBooks app for free from the App Store. To browse the iBooks Store, follow these steps:</p> <ol style="list-style-type: none">1. Open the iBooks app.2. When your bookshelf appears, tap the Store button.  <p>3. Tap Featured, Top Charts, Top Authors, or Search in the bottom navigation bar. You can also view featured books as well as books available on the New York Times bestseller lists (United States only).</p>  <ol style="list-style-type: none">4. Tap a book to view more details or download a free sample. When you buy a book, the book will automatically appear on your iBooks bookshelf. <p>http://support.apple.com/kb/ht4629</p>

U.S. Patent No. 6,963,859

Claim 76	Apple Accused Products (iBooks)
	<p data-bbox="774 266 890 302">Books</p> <p data-bbox="774 318 1667 358">Follow these steps to download purchased books:</p> <ol data-bbox="795 423 1314 464" style="list-style-type: none"> 1. Tap iBooks and tap Store. <div data-bbox="850 495 1480 625">  <p>The screenshot shows the top of the iBooks app. At the top, there are status icons (signal strength, Wi-Fi, and battery) and the time '9:41 AM'. Below this is a navigation bar with three buttons: 'Store' in blue, 'Books' in blue with a downward arrow, and 'Edit' in blue.</p> </div> <ol data-bbox="795 675 1593 773" style="list-style-type: none"> 2. Scroll down and tap Purchased. 3. Tap the book that you want to download. <p data-bbox="533 894 1005 927">http://support.apple.com/kb/HT2519</p> <div data-bbox="533 964 1890 1175"> <p data-bbox="567 984 1008 1013">▼ Can iBooks read books aloud?</p> <p data-bbox="567 1057 1885 1162">Yes, iBooks version 1.3 or later introduces the read-aloud feature included in select children's books from the iBooks Store. The read-aloud feature uses a real narrator to read the book to you and in some books will even highlight the words as you read along.</p> </div> <p data-bbox="533 1216 1005 1248">http://support.apple.com/kb/HT5557</p>

U.S. Patent No. 6,963,859

Claim 76	Apple Accused Products (iBooks)						
	<table border="1"> <tr> <td data-bbox="617 238 806 302">Delete a bookmark:</td><td data-bbox="831 238 1843 302">Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).</td></tr> <tr> <td data-bbox="617 326 806 389">Have a book read to you:</td><td data-bbox="831 326 1843 389">Click the Speaker button , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.</td></tr> <tr> <td data-bbox="617 443 806 506">View your library:</td><td data-bbox="831 443 1843 506">Move the pointer to the top of the book, then click the Library button . You can also choose Window > Library.</td></tr> </table> <p data-bbox="533 581 1020 613">http://support.apple.com/kb/PH14768</p> <p data-bbox="567 667 1451 699">▼ Do books from the iBooks Store have any Accessibility features?</p> <p data-bbox="567 737 1898 800">You can enjoy books downloaded from the iBooks Store using the accessibility features built into iPad and iPhone or iPod touch.</p> <p data-bbox="533 867 1003 899">http://support.apple.com/kb/HT5557</p>	Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).	Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.	View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.
Delete a bookmark:	Click the triangle next to the Bookmark button, move the pointer over the bookmark, then click Delete (x).						
Have a book read to you:	Click the Speaker button  , then click Start Reading. The Speaker button is available if the book includes the Read Aloud feature.						
View your library:	Move the pointer to the top of the book, then click the Library button  . You can also choose Window > Library.						

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Claim 76	Apple Accused Products (iBooks)
	<div data-bbox="562 235 1892 284"> <h2>iOS: Configuring accessibility features Languages Eng</h2> </div> <div data-bbox="562 300 1759 337"> <p>Learn how to enable VoiceOver, Zoom, Invert Colors, and other accessibility features in iOS.</p> </div> <div data-bbox="562 406 1885 479"> <p>When you turn on your iPhone, iPad or iPod touch for the first time, you can quickly enable VoiceOver or Zoom to assist you in configuring the device. Here's how:</p> </div> <div data-bbox="596 511 720 544"> <p>VoiceOver</p> </div> <div data-bbox="617 576 1623 613"> <ul style="list-style-type: none"> ▪ Press the home button three times quickly. This is also called "Triple-click Home". </div> <div data-bbox="596 630 669 662"> <p>Zoom</p> </div> <div data-bbox="617 695 1885 803"> <ul style="list-style-type: none"> ▪ Use three fingers and double-tap the screen to enable Zoom. If you need to increase the level of Zoom, use three fingers to double-tap and hold, then move your fingers up or down on the screen to increase or decrease magnification. </div> <div data-bbox="562 820 1218 852"> <p>Managing accessibility features using your device</p> </div> <div data-bbox="596 868 1669 901"> <p>Go to Settings > General > Accessibility. There are settings for the following features:</p> </div> <div data-bbox="533 950 1260 987"> <p>http://support.apple.com/kb/HT5018?viewlocale=en_US</p> </div>

Claim 81	Apple Accused Products (iBooks)
<p>A computer readable medium as recited in claim 58, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of</p>	<p>On information and belief, the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for the repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p>

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Claim 81	Apple Accused Products (iBooks)
communicating with a master repository for obtaining an identification certificate for the repository.	Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.

SECTION 3: Apple Accused Products—Google Play Books

Claim 1	Apple Accused Products (Google Play Books)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content, said rendering system comprising:	<p>Apple's Accused Instrumentalities that support the Google Play Books application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities"). Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below).⁵</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the Google Play Books application ("Google Play Books App"), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>






⁵ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.





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Claim 1	Apple Accused Products (Google Play Books)
	<p>Description</p> <p>With Google Play Books for iOS start reading today with millions of titles from Google Play on your iPhone, iPod touch, or iPad. Take your favorite books with you on the go and personalize your reading experience. Shop books in your browser on Google Play.</p> <p>Great Reading Experience</p> <ul style="list-style-type: none"> - Change font, search within the book, information about book - Manage your library (archive books after reading) - Night-reading mode - Read books offline - VoiceOver support <p>Discover Millions of Titles on Google Play</p> <ul style="list-style-type: none"> - Over 4 million books in every imaginable category, from the New York Times® bestsellers to favorite classics - Millions of free books available instantly - Free preview pages - Unlimited storage of books in the digital cloud - Worry-free archive <p>Syncs With Your Google Play books library</p> <ul style="list-style-type: none"> - Access all your books wirelessly from the digital cloud - Automatic page position syncing across devices -- pick up reading where you left off. <p>https://itunes.apple.com/us/app/google-play-books/id400989007?mt=8</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
a rendering device configured to render the content; and	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p> <p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is previously purchased from Google Play Books Store.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<div data-bbox="596 250 1743 386"><h1>Read books on your iPhone, iPad, & iPod Touch</h1></div> <div data-bbox="636 464 667 509"></div> <div data-bbox="682 466 1785 496"><p>Some Google Play products and features aren't available in all countries. See what's available in your country</p></div> <div data-bbox="596 555 1810 621"><p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p></div> <div data-bbox="596 656 1822 719"><p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p></div> <div data-bbox="611 777 945 802"><p>Download Google Play Books for iOS</p></div> <div data-bbox="596 865 957 899"><h2>Add books to your library</h2></div> <div data-bbox="596 932 1820 997"><p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p></div> <div data-bbox="596 1031 1827 1057"><p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p></div> <div data-bbox="596 1091 1669 1118"><p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p></div> <div data-bbox="556 1185 1614 1218"><p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p></div>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

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Claim 1	Apple Accused Products (Google Play Books)
<p>a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,</p>	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that includes requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the Google Play Books app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed using a digital certificate. The digital certificate is checked during installation and update of Google Play Books App. Upon information and belief, if the certificate is not present the installation/update fails.</p>

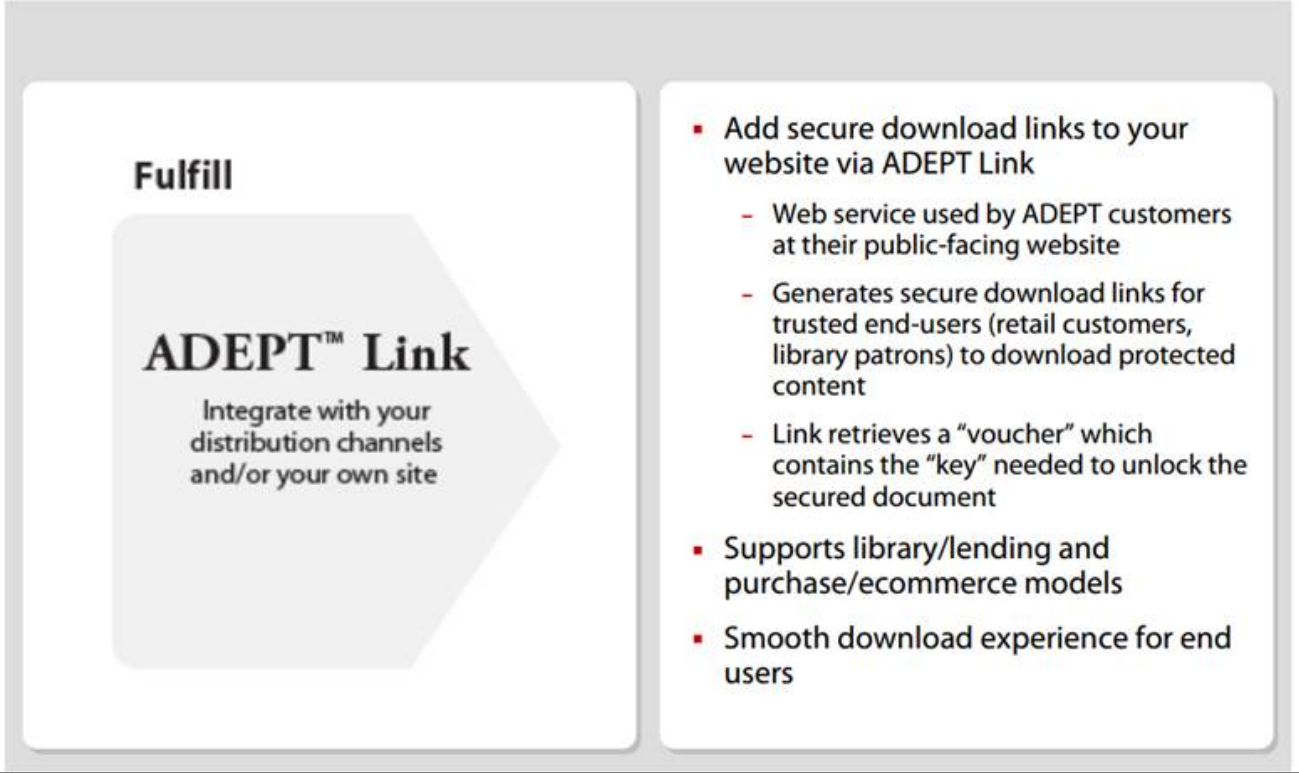
U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (Google Play Books)
	<div data-bbox="709 240 1008 285">App Code Signing</div> <div data-bbox="709 305 1766 618"> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> </div> <div data-bbox="709 643 1766 1036"> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <div data-bbox="562 1078 1444 1114"> http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf </div> <div data-bbox="562 1188 1709 1260"> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce communication integrity.</p> </div> <div data-bbox="562 1299 1892 1370"> <p>For example, DRM schemes such as Adobe DRM are used to generate secure download links for trusted end-users to download protected content.</p> </div>

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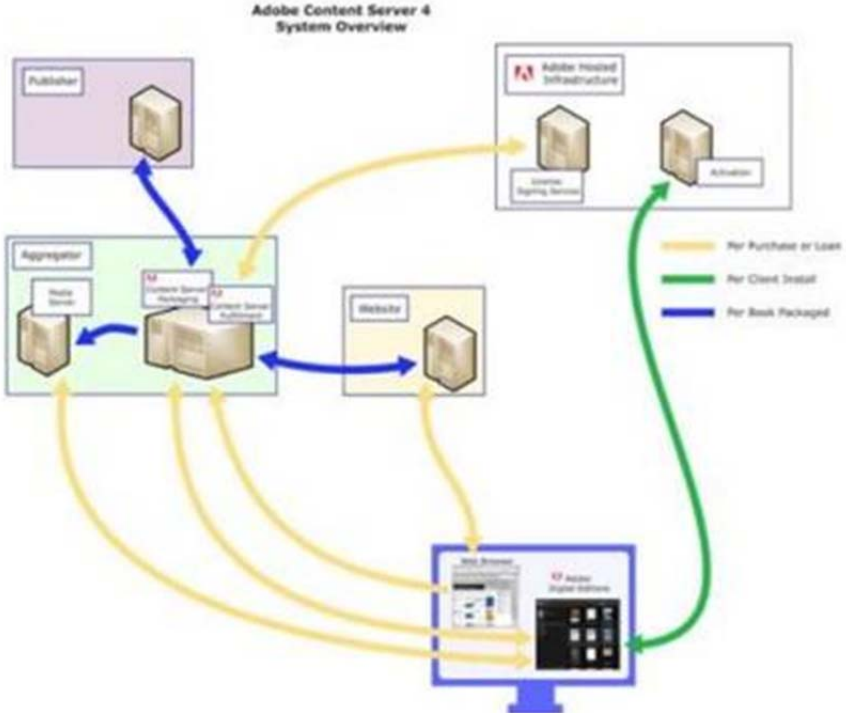
Claim 1	Apple Accused Products (Google Play Books)
	<div data-bbox="613 235 1856 938"><h2 data-bbox="613 235 1856 391">Digital Rights Management (DRM) options for books on Google Play</h2><hr data-bbox="613 435 1856 441"/><p data-bbox="613 456 1856 524">The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p><hr data-bbox="613 540 1856 547"/><p data-bbox="613 565 1856 748">You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p><p data-bbox="613 776 1856 919">For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p></div> <p data-bbox="562 979 1394 1015">https://support.google.com/books/partner/answer/3309439?hl=en</p>

U.S. Patent No. 6,963,859

Claim 1	Apple Accused Products (Google Play Books)
	<p data-bbox="653 240 1545 282">ADEPT workflow: Manage > Protect > <u>Fulfill</u> (cont)</p> <div data-bbox="596 318 1887 1086">  </div> <p data-bbox="562 1130 1717 1162">http://www.mobileread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p data-bbox="562 1203 1822 1271">The Apple Accused iOS devices running the Google Play Books app take steps to enforce physical integrity.</p> <p data-bbox="562 1312 1839 1380">For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>






Claim 1	Apple Accused Products (Google Play Books)
	<p data-bbox="562 233 1839 302">For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p> <div data-bbox="615 342 1856 1049"><h3 data-bbox="632 358 1755 496">Digital Rights Management (DRM) options for books on Google Play</h3><hr data-bbox="632 548 1839 552"/><p data-bbox="632 570 1801 634">The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p><hr data-bbox="632 651 1839 654"/><p data-bbox="632 683 1839 857">You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p><p data-bbox="632 889 1839 1029">For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p></div> <p data-bbox="562 1094 1394 1127">https://support.google.com/books/partner/answer/3309439?hl=en</p>





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Claim 1	Apple Accused Products (Google Play Books)
	<p>In the normal flow (see figure 7), the user visits the publisher or retailer web store to buy an e-book. After the purchase confirmation, he will receive an Adobe Content Server Message (.acsm) file and by opening it with the Adobe Digital Editions, the software will communicate online with the Content Server that will encrypt the e-book and provides it DRM protected with the publisher's authorizations for the user based on his adobe ID. Before the user can read the e-book, he must also have registered his device. That way, the platform makes sure that the file owned by the user is not distributed further.</p> <p style="text-align: center;">Adobe Content Server 4 System Overview</p>  <p style="text-align: center;">Figure 7: Adobe Content Server Architecture (Copied from Adobe (2012) [31]).</p> <p>http://www.mobileread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p>For example, when the user attempts to use an Apple Accused Instrumentality to download a previously</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<p data-bbox="562 237 1864 375">purchased book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (Google Play Books Store) for access to the content.</p> <p data-bbox="562 418 1871 594">Further, when the user requests to read a previously downloaded book on an Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p data-bbox="562 638 1854 740">Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<div data-bbox="611 250 1766 386"><h1>Read books on your iPhone, iPad, & iPod Touch</h1></div> <div data-bbox="653 464 1803 509"> Some Google Play products and features aren't available in all countries. See what's available in your country</div> <div data-bbox="611 553 1833 621"><p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p></div> <div data-bbox="611 654 1848 719"><p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p></div> <div data-bbox="625 768 976 816">Download Google Play Books for iOS</div> <div data-bbox="611 862 980 899"><h2>Add books to your library</h2></div> <div data-bbox="611 930 1845 997"><p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p></div> <div data-bbox="611 1029 1852 1057"><p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p></div> <div data-bbox="611 1089 1692 1118"><p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p></div> <div data-bbox="548 1182 1617 1219"><p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p></div>





Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

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Claim 1	Apple Accused Products (Google Play Books)
<p>wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>






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Claim 1	Apple Accused Products (Google Play Books)
	<div data-bbox="604 245 1430 318"> <h2>Accessibility & text to speech</h2> </div> <div data-bbox="604 370 1806 438"> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> </div> <div data-bbox="604 470 947 506"> <h3>On your Android device</h3> </div> <div data-bbox="615 537 1071 641"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Under "System", select Accessibility. 3. Under "Services", touch TalkBack. </div> <div data-bbox="665 672 1694 703"> <ul style="list-style-type: none"> ◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play . </div> <div data-bbox="615 732 1182 760"> <ol style="list-style-type: none"> 4. Touch the On/Off selector to turn TalkBack on or off. </div> <div data-bbox="604 794 1526 823"> <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> </div> <div data-bbox="615 865 1064 899"> <div>  Read books aloud (flowing text format) </div> </div> <div data-bbox="604 943 884 979"> <h3>On your iOS device</h3> </div> <div data-bbox="615 1011 1194 1153"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Touch General > Accessibility. 3. Select VoiceOver. 4. Touch the On/Off selector to turn VoiceOver on or off. </div> <div data-bbox="604 1183 1587 1214"> <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p> </div> <div data-bbox="550 1287 1677 1325"> <p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p> </div>
the requester mode of	Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted





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Claim 1	Apple Accused Products (Google Play Books)
operation is operative to request access to content from another distributed repository, and	<p>system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a previously purchased book (by tapping on the  download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (Google Play Books Store) for access to the content.</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<div data-bbox="617 250 1766 386"><h1>Read books on your iPhone, iPad, & iPod Touch</h1></div> <div data-bbox="655 464 688 509"></div> <div data-bbox="705 466 1808 496"><p>Some Google Play products and features aren't available in all countries. See what's available in your country</p></div> <div data-bbox="617 553 1837 623"><p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p></div> <div data-bbox="617 656 1848 721"><p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p></div> <div data-bbox="630 777 966 803"><p>Download Google Play Books for iOS</p></div> <div data-bbox="617 863 980 899"><h2>Add books to your library</h2></div> <div data-bbox="617 930 1848 997"><p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p></div> <div data-bbox="617 1029 1854 1057"><p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p></div> <div data-bbox="617 1089 1692 1118"><p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p></div> <div data-bbox="552 1183 1617 1219"><p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p></div>





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Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>





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Claim 1	Apple Accused Products (Google Play Books)
<p>said distributed repository is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

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Claim 1	Apple Accused Products (Google Play Books)
	<div data-bbox="644 282 1457 352"> <h2>Accessibility & text to speech</h2> </div> <div data-bbox="644 406 1829 470"> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> </div> <div data-bbox="644 501 982 537"> <h3>On your Android device</h3> </div> <div data-bbox="657 568 1715 786"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Under "System", select Accessibility. 3. Under "Services", touch TalkBack. <ul style="list-style-type: none"> ◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play . 4. Touch the On/Off selector to turn TalkBack on or off. </div> <div data-bbox="644 818 1551 847"> <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> </div> <div data-bbox="657 889 1098 922"> <div>  Read books aloud (flowing text format) </div> </div> <div data-bbox="644 966 919 1002"> <h3>On your iOS device</h3> </div> <div data-bbox="657 1032 1226 1170"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Touch General > Accessibility. 3. Select VoiceOver. 4. Touch the On/Off selector to turn VoiceOver on or off. </div> <div data-bbox="644 1200 1608 1230"> <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p> </div> <div data-bbox="548 1300 1677 1339"> <p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p> </div>





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Claim 3	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1, wherein said repository comprises means for storing the content.	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>
Claim 15	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1 wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.	<p>On information and belief, The Apple Accused Instrumentalities comprises a rendering device comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the Google Play Books App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>
Claim 16	Apple Accused Products (Google Play Books)

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Claim 16	Apple Accused Products (Google Play Books)
<p>A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book , the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 16	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>





Claim 16	Apple Accused Products (Google Play Books)
	<div data-bbox="606 302 1864 1305"><h2 data-bbox="655 321 1451 386">Accessibility & text to speech</h2><p data-bbox="655 443 1822 505">You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p><h3 data-bbox="655 542 978 573">On your Android device</h3><ol data-bbox="655 609 1100 708" style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<p data-bbox="716 740 1713 766">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play .</p><ol data-bbox="655 800 1211 826" style="list-style-type: none">4. Touch the On/Off selector to turn TalkBack on or off.<p data-bbox="655 860 1549 886">For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p><div data-bbox="655 911 1864 980"><div data-bbox="655 911 1864 980"> Read books aloud (flowing text format)</div></div><h3 data-bbox="655 1008 917 1039">On your iOS device</h3><ol data-bbox="655 1075 1224 1209" style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off.<p data-bbox="655 1243 1604 1269">For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p></div> <div data-bbox="558 1344 1673 1377">https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</div>

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Claim 19	Apple Accused Products (Google Play Books)
<p>A rendering system as recited in claim 1, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (displayed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 19	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

Claim 19	Apple Accused Products (Google Play Books)
	<div data-bbox="644 282 1457 352"> <h2>Accessibility & text to speech</h2> </div> <div data-bbox="646 406 1829 470"> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> </div> <div data-bbox="646 503 982 537"> <h3>On your Android device</h3> </div> <div data-bbox="657 570 1715 787"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Under "System", select Accessibility. 3. Under "Services", touch TalkBack. <ul style="list-style-type: none"> ◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play . 4. Touch the On/Off selector to turn TalkBack on or off. </div> <div data-bbox="646 820 1554 847"> <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> </div> <div data-bbox="657 889 1098 922"> <div>  Read books aloud (flowing text format) </div> </div> <div data-bbox="646 966 919 1002"> <h3>On your iOS device</h3> </div> <div data-bbox="657 1034 1226 1170"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Touch General > Accessibility. 3. Select VoiceOver. 4. Touch the On/Off selector to turn VoiceOver on or off. </div> <div data-bbox="646 1201 1608 1230"> <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p> </div> <div data-bbox="550 1302 1677 1339"> <p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p> </div>





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Claim 20	Apple Accused Products (Google Play Books)
<p>A rendering system as recited in claim 1, wherein the manner of use is a manner of playing.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (played) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

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Claim 20	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

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Claim 20	Apple Accused Products (Google Play Books)
	<div data-bbox="644 279 1457 349"> <h2>Accessibility & text to speech</h2> </div> <div data-bbox="646 402 1822 467"> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> </div> <div data-bbox="646 500 982 535"> <h3>On your Android device</h3> </div> <div data-bbox="659 566 1715 784"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Under "System", select Accessibility. 3. Under "Services", touch TalkBack. <ul style="list-style-type: none"> ◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play . 4. Touch the On/Off selector to turn TalkBack on or off. </div> <div data-bbox="646 816 1551 846"> <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> </div> <div data-bbox="659 886 1100 920"> <div>  Read books aloud (flowing text format) </div> </div> <div data-bbox="646 964 921 1000"> <h3>On your iOS device</h3> </div> <div data-bbox="659 1032 1226 1170"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Touch General > Accessibility. 3. Select VoiceOver. 4. Touch the On/Off selector to turn VoiceOver on or off. </div> <div data-bbox="646 1200 1608 1230"> <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p> </div> <div data-bbox="550 1300 1677 1338"> <p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p> </div>

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Claim 21	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1, wherein the rendering device and the repository are integrated into a secure system having a secure boundary.	<p>On information and belief, the Apple Accused Instrumentalities comprises a rendering device and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that are integrated into a secure system having a secure boundary.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 24	Apple Accused Products (Google Play Books)
A rendering system as recited in claim 1, further comprising means for communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the rendering system (Apple Accused Instrumentalities) comprises a means for communicating with the master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the computing elements, software, and/or circuitry that perform the communication with the master repository for obtaining an identification certificate for the repository.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 58	Apple Accused Products (Google Play Books)
A computer readable	Apple's Accused Instrumentalities that support the Google Play Books application are identified in

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Claim 58	Apple Accused Products (Google Play Books)
medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content, and operative to render content in accordance with usage rights associated with the content, said computer readable instructions configured to cause one or more computer processors to perform the steps of:	<p>Exhibit 2 which includes corresponding documentation. (Collectively, the “Apple Accused Instrumentalities”). Each of the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions embedded therein for use in a distributed system for managing use of content and operative to render content in accordance with usage rights associated with the content. (See below).⁶</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the Google Play Books application (“Google Play Books App”), which is available on any device that has an iOS operating system. Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p>






⁶ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

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Claim 58	Apple Accused Products (Google Play Books)
	<p>Description</p> <p>With Google Play Books for iOS start reading today with millions of titles from Google Play on your iPhone, iPod touch, or iPad. Take your favorite books with you on the go and personalize your reading experience. Shop books in your browser on Google Play.</p> <p>Great Reading Experience</p> <ul style="list-style-type: none"> - Change font, search within the book, information about book - Manage your library (archive books after reading) - Night-reading mode - Read books offline - VoiceOver support <p>Discover Millions of Titles on Google Play</p> <ul style="list-style-type: none"> - Over 4 million books in every imaginable category, from the New York Times® bestsellers to favorite classics - Millions of free books available instantly - Free preview pages - Unlimited storage of books in the digital cloud - Worry-free archive <p>Syncs With Your Google Play books library</p> <ul style="list-style-type: none"> - Access all your books wirelessly from the digital cloud - Automatic page position syncing across devices -- pick up reading where you left off. <p>https://itunes.apple.com/us/app/google-play-books/id400989007?mt=8</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p>

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Claim 58	Apple Accused Products (Google Play Books)
	<p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
configuring a rendering device to render the content;	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p> <p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is previously purchased from Google Play Books Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<div data-bbox="619 250 1764 386"><h1>Read books on your iPhone, iPad, & iPod Touch</h1></div> <div data-bbox="657 464 688 509"></div> <div data-bbox="705 466 1808 496"><p>Some Google Play products and features aren't available in all countries. See what's available in your country</p></div> <div data-bbox="619 553 1837 623"><p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p></div> <div data-bbox="619 656 1848 721"><p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p></div> <div data-bbox="632 777 968 803"><p>Download Google Play Books for iOS</p></div> <div data-bbox="619 863 980 899"><h2>Add books to your library</h2></div> <div data-bbox="619 930 1845 997"><p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p></div> <div data-bbox="619 1029 1852 1057"><p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p></div> <div data-bbox="619 1089 1692 1118"><p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p></div> <div data-bbox="556 1183 1617 1219"><p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p></div>

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Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

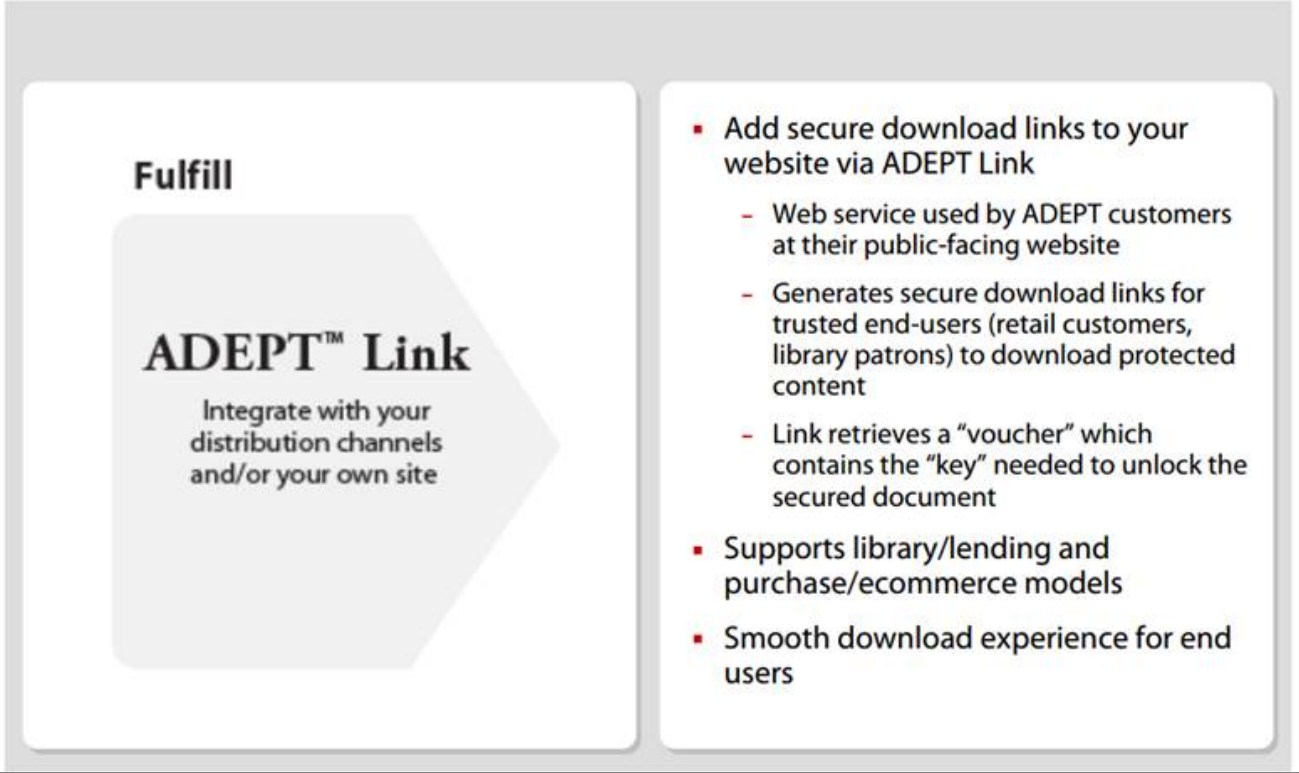
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Claim 58	Apple Accused Products (Google Play Books)
<p>configuring a distributed repository coupled to said rendering device to include a requester mode of operation and server mode of operation;</p>	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that is coupled to a rendering device and configures to include requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the Google Play Books app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce behavioral integrity.</p> <p>For example, to enforce behavioral integrity, upon installation & update, iOS requires all apps to be signed using a digital certificate. The digital certificate is checked during installation and update of Google Play Books App. Upon information and belief, if the certificate is not present the installation/update fails.</p>

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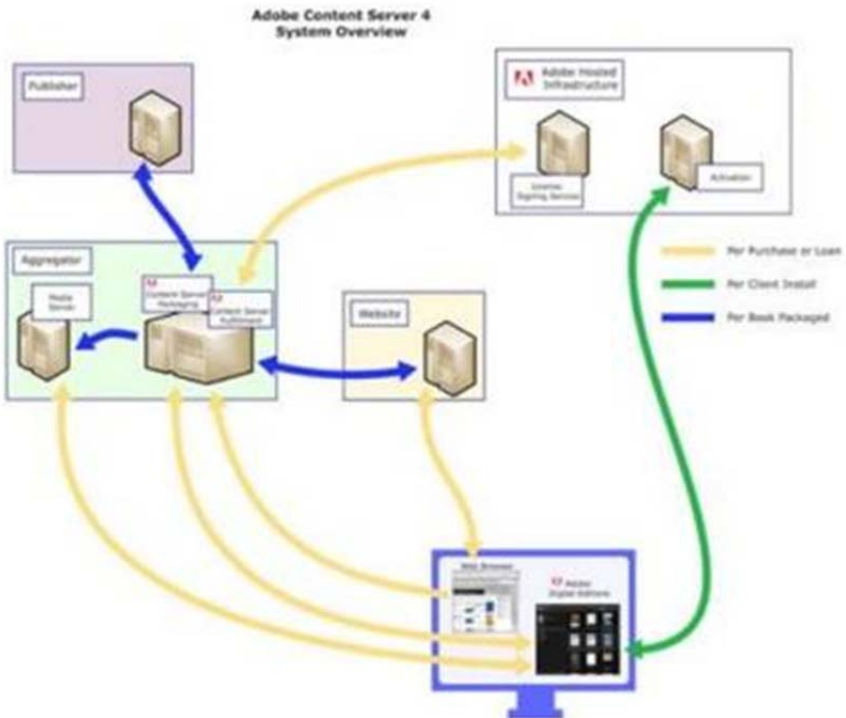
Claim 58	Apple Accused Products (Google Play Books)
	<div data-bbox="709 240 1008 285">App Code Signing</div> <div data-bbox="709 305 1766 618"> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <div data-bbox="562 1078 1444 1114"> http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf </div> <div data-bbox="562 1187 1709 1260"> <p>The Apple Accused iOS devices running the Google Play Books app take steps to enforce communication integrity.</p> </div> <div data-bbox="562 1295 1892 1369"> <p>For example, DRM schemes such as Adobe DRM are used to generate secure download links for trusted end-users to download protected content.</p> </div>

Claim 58	Apple Accused Products (Google Play Books)
	<div data-bbox="613 235 1856 938"><h2 data-bbox="625 248 1755 386">Digital Rights Management (DRM) options for books on Google Play</h2><hr/><p data-bbox="625 459 1806 524">The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p><hr/><p data-bbox="625 573 1839 748">You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p><p data-bbox="625 781 1831 917">For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p></div> <p data-bbox="558 982 1394 1015">https://support.google.com/books/partner/answer/3309439?hl=en</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p data-bbox="653 240 1545 280">ADEPT workflow: Manage > Protect > <u>Fulfill</u> (cont)</p> <div data-bbox="596 318 1887 1086">  <p data-bbox="726 472 827 508">Fulfill</p> <p data-bbox="737 643 1062 688">ADEPT™ Link</p> <p data-bbox="785 711 1035 802">Integrate with your distribution channels and/or your own site</p> <ul data-bbox="1283 431 1835 1000" style="list-style-type: none"> ▪ Add secure download links to your website via ADEPT Link <ul style="list-style-type: none"> - Web service used by ADEPT customers at their public-facing website - Generates secure download links for trusted end-users (retail customers, library patrons) to download protected content - Link retrieves a “voucher” which contains the “key” needed to unlock the secured document ▪ Supports library/lending and purchase/ecommerce models ▪ Smooth download experience for end users </div> <p data-bbox="562 1130 1717 1162">http://www.mobileread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p data-bbox="562 1203 1822 1271">The Apple Accused iOS devices running the Google Play Books app take steps to enforce physical integrity.</p> <p data-bbox="562 1312 1835 1380">For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p>

Claim 58	Apple Accused Products (Google Play Books)
	<p data-bbox="562 235 1839 305">For example, the content on device is protected using encryption, and the decryption keys are stored securely.</p> <div data-bbox="615 342 1856 1049"><h3 data-bbox="632 358 1755 500">Digital Rights Management (DRM) options for books on Google Play</h3><hr data-bbox="632 548 1839 552"/><p data-bbox="632 570 1801 634">The ability to sell books on Google Play is available to accounts based in a growing number of countries. View the list of currently eligible countries.</p><hr data-bbox="632 651 1839 654"/><p data-bbox="632 683 1839 857">You can choose if you would prefer not to apply Digital Rights Management (DRM) software to the digital file download of your book. DRM is intended to protect the content owner and keep e-books secure from unauthorized sharing. If you choose to make your book available on Google Play without DRM, then consumers will have more flexibility in using the content file. To turn off DRM, visit the Content files page in your book-level settings and uncheck the box labeled DRM Enabled. There's also a template-level setting to disable DRM for any new books.</p><p data-bbox="632 889 1839 1031">For DRM on download files, Google will support Adobe Content Server 4, the leading open, cross-platform protection solution in the industry with more than 150 publishers and content aggregators using Adobe's technology today. Google will require users to link the Adobe DRM software in their books via a one-time authentication per reading system. These devices may then request ACS4-encrypted ePub or PDF files via a Google-provided API.</p></div> <p data-bbox="562 1092 1394 1125">https://support.google.com/books/partner/answer/3309439?hl=en</p>






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Claim 58	Apple Accused Products (Google Play Books)
	<p>In the normal flow (see figure 7), the user visits the publisher or retailer web store to buy an e-book. After the purchase confirmation, he will receive an Adobe Content Server Message (.acsm) file and by opening it with the Adobe Digital Editions, the software will communicate online with the Content Server that will encrypt the e-book and provides it DRM protected with the publisher's authorizations for the user based on his adobe ID. Before the user can read the e-book, he must also have registered his device. That way, the platform makes sure that the file owned by the user is not distributed further.</p> <p style="text-align: center;">Adobe Content Server 4 System Overview</p>  <p style="text-align: center;">Figure 7: Adobe Content Server Architecture (Copied from Adobe (2012) [31]).</p> <p>http://www.mobileread.com/forums/attachment.php?attachmentid=23955&d=1235077245</p> <p>For example, when the user attempts to use an Apple Accused Instrumentality to download a previously</p>

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Claim 58	Apple Accused Products (Google Play Books)
	<p>purchased book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (Google Play Books Store) for access to the content.</p> <p>Further, when the user requests to read a previously downloaded book on an Apple Accused Instrumentality, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>





U.S. Patent No. 6,963,859





Claim 58	Apple Accused Products (Google Play Books)
	<div data-bbox="617 250 1766 386"><h1>Read books on your iPhone, iPad, & iPod Touch</h1></div> <div data-bbox="657 464 688 509"></div> <div data-bbox="705 466 1808 496"><p>Some Google Play products and features aren't available in all countries. See what's available in your country</p></div> <div data-bbox="617 553 1837 623"><p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p></div> <div data-bbox="617 656 1848 721"><p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p></div> <div data-bbox="632 777 968 803"><p>Download Google Play Books for iOS</p></div> <div data-bbox="617 863 980 899"><h2>Add books to your library</h2></div> <div data-bbox="617 930 1848 998"><p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p></div> <div data-bbox="617 1029 1854 1057"><p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p></div> <div data-bbox="617 1089 1692 1118"><p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p></div> <div data-bbox="552 1183 1617 1219"><p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p></div>

Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play . 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>


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Claim 58	Apple Accused Products (Google Play Books)
<p>enforcing usage rights associated with the content and permitting the rendering device to render the content in accordance with a manner of use specified by the usage rights, when in the server mode of operation;</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>






Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>





Claim 58	Apple Accused Products (Google Play Books)
	<div data-bbox="598 280 1430 352"> <h2>Accessibility & text to speech</h2> </div> <div data-bbox="598 406 1808 472"> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> </div> <div data-bbox="598 505 947 540"> <h3>On your Android device</h3> </div> <div data-bbox="613 573 1071 677"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Under "System", select Accessibility. 3. Under "Services", touch TalkBack. </div> <div data-bbox="663 708 1694 738"> <ul style="list-style-type: none"> ◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play . </div> <div data-bbox="613 768 1182 795"> <ol style="list-style-type: none"> 4. Touch the On/Off selector to turn TalkBack on or off. </div> <div data-bbox="598 828 1526 859"> <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> </div> <div data-bbox="613 902 1064 935"> <div>  Read books aloud (flowing text format) </div> </div> <div data-bbox="598 977 884 1016"> <h3>On your iOS device</h3> </div> <div data-bbox="613 1047 1197 1190"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Touch General > Accessibility. 3. Select VoiceOver. 4. Touch the On/Off selector to turn VoiceOver on or off. </div> <div data-bbox="598 1221 1585 1252"> <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p> </div> <div data-bbox="548 1321 1677 1362"> <p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p> </div>

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Claim 58	Apple Accused Products (Google Play Books)
requesting access to content from another distributed repository, when in the requester mode of operation; and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a previously purchased book (by tapping on the  download icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (Google Play Books Store) for access to the content.</p>





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Claim 58	Apple Accused Products (Google Play Books)
	<div data-bbox="619 250 1764 386"><h1>Read books on your iPhone, iPad, & iPod Touch</h1></div> <div data-bbox="657 464 688 509"></div> <div data-bbox="705 466 1808 496"><p>Some Google Play products and features aren't available in all countries. See what's available in your country</p></div> <div data-bbox="619 553 1837 621"><p>You can read books on your iPhone, iPad, or iPod Touch using the  Google Play Books app  available on the iTunes App Store. Google Play Books is available for Apple devices running iOS 5.0 and higher.</p></div> <div data-bbox="619 656 1848 719"><p>If you're using an older device that doesn't work with the Google Play Books app, you can download and transfer books to a supported eReader using Adobe Digital Editions or read books on your computer on Google Play (play.google.com/books).</p></div> <div data-bbox="632 777 968 802"><p>Download Google Play Books for iOS</p></div> <div data-bbox="619 863 980 899"><h2>Add books to your library</h2></div> <div data-bbox="619 930 1845 997"><p>To add books to your library, go to Google Play on your computer (play.google.com) or the  Google Play Store app on a supported Android device.</p></div> <div data-bbox="619 1029 1852 1057"><p>After you add a book, it will show up in your library as long as you're signed in to the account that you used to buy the book.</p></div> <div data-bbox="619 1089 1692 1118"><p>To see what account you're signed in to, touch the  Settings icon. Your account will be listed under "Info".</p></div> <div data-bbox="556 1183 1617 1219"><p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p></div>





Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play . 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

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Claim 58	Apple Accused Products (Google Play Books)
<p>receiving by said distributed repository a request to render the content and permitting the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which is operative to receive a request to render the content and permit the content to be rendered only if a manner of use specified in the request corresponds to a manner of use specified in the usage rights.</p> <p>When the user requests to view a previously downloaded book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>


Claim 58	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

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Claim 58	Apple Accused Products (Google Play Books)
	<div data-bbox="606 282 1409 350"><h2>Accessibility & text to speech</h2></div> <div data-bbox="606 406 1776 469"><p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p></div> <div data-bbox="606 503 938 535"><h3>On your Android device</h3></div> <div data-bbox="617 570 1058 669"><ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.</div> <div data-bbox="665 701 1667 729"><p>◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play .</p></div> <div data-bbox="617 760 1169 786"><ol style="list-style-type: none">4. Touch the On/Off selector to turn TalkBack on or off.</div> <div data-bbox="606 820 1505 846"><p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p></div> <div data-bbox="617 889 1054 920"><div> Read books aloud (flowing text format)</div></div> <div data-bbox="606 966 875 1000"><h3>On your iOS device</h3></div> <div data-bbox="617 1034 1182 1170"><ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off.</div> <div data-bbox="606 1201 1562 1230"><p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p></div> <div data-bbox="552 1304 1675 1338"><p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p></div>





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Claim 60	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 58, wherein said repository comprises means for storing the content.</p>	<p>Each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) which comprises means for storing the content.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content.</p> <p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 62	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 60, wherein said means for storing comprises means for storing content after rendering.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that comprises means for storing the content after rendering.</p> <p>For example, when the user attempts to download a previously purchased book (by tapping on the  download icon displayed on the Apple Accused Instrumentality), it gets downloaded and stored in the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights). User can read the book unlimited number of times after it is stored in the Apple Accused Instrumentality's repository.</p> <p>Further, each of the Accused Apple Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) and an internal memory for storing the content after rendering.</p>

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Claim 62	Apple Accused Products (Google Play Books)
	<p>This limitation is governed by 35 U.S.C. § 112(6). The structure within the Apple Accused Instrumentalities that performs the claimed function is the memory that stores the content.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>





Claim 62	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>





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Claim 71	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 58, wherein said rendering device comprises a computer system and said repository comprises software executed on the computer system.</p>	<p>On information and belief, The Apple Accused Instrumentalities comprises a rendering device comprises a computer system and a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) comprises software executed on the computer system.</p> <p>For example, each of the Apple Accused Instrumentalities comprises a computer system and the Google Play Books App which is a software that is executed on the Apple Accused Instrumentality.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>
Claim 72	Apple Accused Products (Google Play Books)
<p>A rendering system as recited in claim 1, further comprising an execution device coupled to said repository, said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises an execution device coupled to the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) and said repository being further operative to permit said execution device to execute a computer program only in a manner specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book , the Apple Accused Instrumentality's repository (implemented as a trusted system that maintains physical, communications and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (e.g., executed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple</p>

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Claim 72	Apple Accused Products (Google Play Books)
	<p>Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>





Claim 72	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="630 389 871 633">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play. 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <hr/> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

Claim 72	Apple Accused Products (Google Play Books)
	<div data-bbox="606 302 1864 1305"><h2 data-bbox="655 321 1451 386">Accessibility & text to speech</h2><p data-bbox="655 443 1822 505">You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p><h3 data-bbox="655 542 978 573">On your Android device</h3><ol data-bbox="655 609 1100 708" style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.<p data-bbox="718 740 1713 766">◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play .</p><ol data-bbox="655 800 1209 826" style="list-style-type: none">4. Touch the On/Off selector to turn TalkBack on or off.<p data-bbox="655 860 1549 886">For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p><div data-bbox="655 911 1864 980"><div data-bbox="655 911 1864 980"> Read books aloud (flowing text format)</div></div><h3 data-bbox="655 1008 915 1039">On your iOS device</h3><ol data-bbox="655 1075 1224 1209" style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off.<p data-bbox="655 1243 1604 1269">For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p></div> <div data-bbox="560 1344 1673 1377">https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</div>

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Claim 75	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of displaying.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of displaying.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (displayed) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>





Claim 75	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play . 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

Claim 75	Apple Accused Products (Google Play Books)
	<div data-bbox="598 282 1411 352"> <h2>Accessibility & text to speech</h2> </div> <div data-bbox="598 406 1778 470"> <p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p> </div> <div data-bbox="598 503 938 537"> <h3>On your Android device</h3> </div> <div data-bbox="611 570 1669 786"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Under "System", select Accessibility. 3. Under "Services", touch TalkBack. <ul style="list-style-type: none"> ◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play . 4. Touch the On/Off selector to turn TalkBack on or off. </div> <div data-bbox="598 820 1505 847"> <p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p> </div> <div data-bbox="611 889 1054 922"> <div>  Read books aloud (flowing text format) </div> </div> <div data-bbox="598 966 875 1002"> <h3>On your iOS device</h3> </div> <div data-bbox="611 1034 1182 1170"> <ol style="list-style-type: none"> 1. Go to your device's main Settings menu. 2. Touch General > Accessibility. 3. Select VoiceOver. 4. Touch the On/Off selector to turn VoiceOver on or off. </div> <div data-bbox="598 1201 1562 1230"> <p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p> </div> <div data-bbox="548 1302 1675 1339"> <p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p> </div>

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Claim 76	Apple Accused Products (Google Play Books)
<p>A computer readable medium as recited in claim 58, wherein the manner of use is a manner of playing.</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that permits the content to be rendered only if the manner of use specified in the request corresponds to a manner of use specified in the usage rights where in the manner of use includes a manner of playing.</p> <p>When the user requests to view a previously downloaded book the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and permits the rendering accordingly. These usage rights specify the manner of use in which the book can be rendered (played) on the Apple Accused instrumentality.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech permissions associated with the book and determines if Text to Speech feature can be rendered in normal mode of operation of the Apple Accused Instrumentality or in Accessibility mode of operation of the Apple Accused Instrumentality (Voice Over is enabled). Based on this information, the Apple Accused Instrumentality's repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech feature of the book accordingly.</p> <p>Thus, if Text to Speech feature is allowed in Accessibility mode of operation then Read aloud can be done only on the devices with Voice Over enabled.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>

Claim 76	Apple Accused Products (Google Play Books)
	<p>Bookmark Google Play</p> <p>To quickly shop for books on Google Play, add a shortcut to your home screen using your device's Safari browser.</p> <hr/> <div data-bbox="604 391 842 630">  </div> <ol style="list-style-type: none"> 1. Open Safari. 2. Go to Google Play . 3. Touch the  (iOS 6)  (iOS 7) Share icon. 4. Select Add to home screen. <hr/> <p>Read books</p> <p>To download books and start reading, touch a book's cover or touch a book's  Download icon. If you've already downloaded a book, it will open right away.</p> <p>After a book has been downloaded, you can read the book without an Internet connection as long as you stay signed in to the Google Account that you used to buy the book. If you're going to be traveling and won't have an Internet connection, it's a good idea to download books before your trip.</p> <p>If you sign out of your account, you'll need to download your books again before you can open them.</p> <p>Manage your library</p> <p>You can sort your library by date, title, or author using the sorting options at the bottom of your screen. To remove books from appearing in your library touch Manage (near the top right corner of your screen) > Archive.</p> <ul style="list-style-type: none"> • To remove book samples from your library, touch Manage > Delete. <p>You can bring archived books back to your library by touching Manage > Archive > Restore.</p> <p>https://support.google.com/googleplay/answer/188504?hl=en&ref_topic=4444148</p>

Claim 76	Apple Accused Products (Google Play Books)
	<div data-bbox="604 282 1411 350"><h2>Accessibility & text to speech</h2></div> <div data-bbox="604 406 1778 469"><p>You can turn on accessibility options, including TalkBack (Android) and VoiceOver (iOS), on your mobile device and use them when you read books available in flowing text format on the  Google Play Books app.</p></div> <div data-bbox="604 503 938 537"><h3>On your Android device</h3></div> <div data-bbox="615 570 1058 669"><ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Under "System", select Accessibility.3. Under "Services", touch TalkBack.</div> <div data-bbox="663 701 1669 729"><p>◦ If you don't have TalkBack installed on your device, you can download TalkBack on Google Play .</p></div> <div data-bbox="615 760 1169 786"><ol style="list-style-type: none">4. Touch the On/Off selector to turn TalkBack on or off.</div> <div data-bbox="604 820 1507 846"><p>For more information about TalkBack and Android accessibility features, visit TalkBack Help.</p></div> <div data-bbox="615 889 1054 922"><div> Read books aloud (flowing text format)</div></div> <div data-bbox="604 966 875 1000"><h3>On your iOS device</h3></div> <div data-bbox="615 1034 1182 1170"><ol style="list-style-type: none">1. Go to your device's main Settings menu.2. Touch General > Accessibility.3. Select VoiceOver.4. Touch the On/Off selector to turn VoiceOver on or off.</div> <div data-bbox="604 1201 1564 1230"><p>For more information about VoiceOver and iOS accessibility features, visit Apple's support site .</p></div> <div data-bbox="550 1302 1677 1338"><p>https://support.google.com/googleplay/answer/1062965?hl=en-IN&ref_topic=4444087</p></div>

Claim 81	Apple Accused Products (Google Play Books)
A computer readable medium as recited in claim 58, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository for obtaining an identification certificate for the repository.	<p>On information and belief, the Apple Accused Instrumentalities comprises a computer readable medium including one or more computer readable instructions, wherein said computer readable instructions are configured to cause the one or more computer processors to perform the step of communicating with a master repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) for obtaining an identification certificate for the repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>



SECTION 4: Apple Accused Products—Amazon Kindle

Claim 1	Apple Accused Products (Amazon Kindle)
1. A rendering system adapted for use in a distributed system for managing use of content, said rendering system being operative to rendering content in accordance with usage	<p>Apple's Accused Instrumentalities that support the Amazon Kindle application are identified in Exhibit 2 which includes corresponding documentation. (Collectively, the "Apple Accused Instrumentalities"). Each of the Apple Accused Instrumentalities is a rendering system adapted for use in a distributed system for managing use of content said rendering system being operative to rendering content in accordance with usage rights associated with the content. (See below).⁷</p> <p>For example, each of these Apple Accused Instrumentalities configured to activate the Amazon Kindle Application ("Amazon Kindle App"), which is available on any device that has an iOS operating system.</p>

⁷ These infringement contentions are prepared with publicly available information and have not been prepared with the benefit of discovery. ContentGuard reserves the right to update, amend, or supplement these contentions and/or to add Accused Instrumentalities based on information received by ContentGuard or otherwise produced by Defendants in this litigation. Such information may include, but is not limited to, data sheets, design specifications, source code, testing information, reference designs, implementation and utilization information, and/or schematics. ContentGuard reserves the right to amend these contentions, including adding and/or amending a doctrine of equivalents analysis for any claim element, as discovery progresses.

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Claim 1	Apple Accused Products (Amazon Kindle)
rights associated with the content, said rendering system comprising:	<p>Each of the Apple Accused Instrumentalities comes with iOS pre-installed.</p> <div data-bbox="575 305 1896 597" style="border: 1px solid black; padding: 10px;"> <p>Description</p> <p>The Kindle app is optimized for the iPad, iPhone, and iPod touch, giving users the ability to read Kindle books, newspapers, magazines, textbooks and PDFs on a beautiful, easy-to-use interface. You'll have access to over 1,000,000* books in the Kindle Store plus hundreds* of newspapers and magazines. Amazon Whispersync automatically syncs your last page read, bookmarks, notes, and highlights across devices (including Kindle), so you can pick up your book where you left off on another device.</p> </div> <p>https://itunes.apple.com/us/app/kindle-read-books-ebooks-magazines/id302584613?mt=8</p> <p>ContentGuard's investigation is ongoing and discovery has not yet begun. ContentGuard reserves the right to amend or supplement these contentions after further investigation and discovery. ContentGuard further reserves the right to accuse different products, or find alternative literal and/or equivalent infringing elements in Apple's products, based on further investigation and discovery, the claim construction process before the Court, or other circumstances so meriting.</p> <p>Apple has not yet advised ContentGuard of any non-infringement arguments, as to this or any other claim limitation. If and when it does so, ContentGuard will address such arguments, including by providing any appropriate additional discussion pertaining to the application of the doctrine of equivalents with respect to Apple's argument concerning non-infringement.</p>
a rendering device configured to render the content; and	<p>Each of the Apple Accused Instrumentalities comprises a rendering device configured to render the content.</p> <p>For example, each of the Apple Accused Instrumentalities is configured to render a book which is previously purchased from Amazon Kindle Store.</p> <p>See, e.g., the specification pages from Apple's website (CG-000000133 – CG-000000235; CG-000001504 – CG-000001524; CG-000002521 – CG-000002534); Exhibit-2.</p>

Claim 1	Apple Accused Products (Amazon Kindle)
	<div data-bbox="604 277 1837 337"><h2>Register Kindle for iPhone, iPad, and iPod touch</h2></div> <div data-bbox="604 383 1787 462"><p>To buy and read Kindle content, you'll need to register the Kindle reading app to your Amazon account.</p></div> <div data-bbox="604 531 1551 561"><p>To register, make sure your device is connected to a wireless or data network.</p></div> <div data-bbox="621 597 1190 628"><ol style="list-style-type: none">1. From your device, tap the Kindle app icon.</div> <div data-bbox="1108 660 1392 924">The image shows the Kindle app icon, which is a blue square with rounded corners. Inside the square, the word "kindle" is written in a yellow, lowercase, sans-serif font. Below the word, there is a black silhouette of a person sitting and reading a book. At the bottom of the square, the word "Kindle" is written in a small, white, sans-serif font.</div> <div data-bbox="621 956 1375 1024"><ol style="list-style-type: none">2. Enter your Amazon account e-mail address and password.3. Tap Sign In.</div> <div data-bbox="659 1031 1266 1062"><p>Your Kindle content appears under the Cloud tab.</p></div> <div data-bbox="659 1088 1816 1122"><p>Note: To view or change your registration, tap the Settings  icon on the app Home screen.</p></div> <div data-bbox="558 1183 1539 1218"><p>http://www.amazon.com/gp/help/customer/display.html?nodeId=201244850</p></div>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<div data-bbox="653 237 1709 354"> <h2>Deliver to Kindle for iPad, iPhone, and iPod touch</h2> </div> <div data-bbox="653 399 1759 477"> <p>Deliver books, periodicals, and personal documents from Your Kindle Library to your Kindle reading app.</p> </div> <hr/> <div data-bbox="653 540 1814 607"> <p>To successfully deliver Kindle content, the Kindle reading app must be registered to the same Amazon account you use to purchase Kindle content.</p> </div> <div data-bbox="653 641 1793 708"> <p>After you buy a Kindle book, magazine, or newspaper, the title is saved to Your Kindle Library in the Cloud. New purchases are sent to your reading app and appear under the Cloud tab.</p> </div> <div data-bbox="667 740 1755 915"> <ol style="list-style-type: none"> 1. Visit Manage Your Kindle and locate the content you want to deliver to Kindle for iOS. 2. From the Actions drop-down, select Deliver to my. 3. Select your iPhone, iPad, or iPod touch from the Deliver to my drop-down, and then select Deliver. 4. From the Kindle reading app Home screen, tap the Device tab to view and open the title. </div> <div data-bbox="558 982 1885 1016"> <p>http://www.amazon.com/gp/help/customer/display.html/ref=hp_left_sib?ie=UTF8&nodeId=201244880</p> </div>
a distributed repository coupled to said rendering device and including a requester mode of operation and server mode of operation,	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) that coupled to a rendering device and including a requester mode of operation and server mode of operation.</p> <p>The Apple Accused Instrumentality contains certain chipset and software elements (including portions of the operating system software and the Amazon Kindle app) that provide physical integrity, communications integrity and behavioral integrity and supports usage rights.</p> <p>The Apple Accused devices running the Amazon Kindle App take steps to enforce behavioral integrity.</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<p>For example, to enforce behavioral integrity, Apple installs Built-In apps in the controlled, secure environment of their own factory. Upon upgrade and/or installation, Apple requires all apps (even Built-In apps) to be signed using a certificate to enforce behavioral integrity. Upon information and belief, if the certificate is not present the installation/update fails.</p> <div data-bbox="835 451 1633 1013" style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p>App Code Signing</p> <p>Once the iOS kernel has started, it controls which user processes and apps can be run. To ensure that all apps come from a known and approved source and have not been tampered with, iOS requires that all executable code be signed using an Apple-issued certificate. Apps provided with the device, like Mail and Safari, are signed by Apple. Third-party apps must also be validated and signed using an Apple-issued certificate. Mandatory code signing extends the concept of chain of trust from the OS to apps, and prevents third-party apps from loading unsigned code resources or using self-modifying code.</p> <p>In order to develop and install apps on iOS devices, developers must register with Apple and join the iOS Developer Program. The real-world identity of each developer, whether an individual or a business, is verified by Apple before their certificate is issued. This certificate enables developers to sign apps and submit them to the App Store for distribution. As a result, all apps in the App Store have been submitted by an identifiable person or organization, serving as a deterrent to the creation of malicious apps. They have also been reviewed by Apple to ensure they operate as described and don't contain obvious bugs or other problems. In addition to the technology already discussed, this curation process gives customers confidence in the quality of the apps they buy.</p> </div> <p>http://images.apple.com/ipad/business/docs/iOS_Security_Feb14.pdf</p> <p>The Apple Accused devices running the Amazon Kindle App take steps to enforce communication integrity.</p> <p>For example, the client device receives a certificate from the server as part of the SSL/TLS protocol that the server is a trusted entity. Upon information and belief the server receives proof from the client that the client is a trusted entity.</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<div data-bbox="705 266 1766 737"><p>7.4.2. Server Certificate</p><p>When this message will be sent:</p><p>The server MUST send a Certificate message whenever the agreed-upon key exchange method uses certificates for authentication (this includes all key exchange methods defined in this document except DH_anon). This message will always immediately follow the ServerHello message.</p><p>Meaning of this message:</p><p>This message conveys the server's certificate chain to the client.</p><p>The certificate MUST be appropriate for the negotiated cipher suite's key exchange algorithm and any negotiated extensions.</p></div> <p>http://tools.ietf.org/html/rfc5246#section-7.4.2</p> <p>The Apple Accused devices running the Amazon Kindle App take steps to enforce physical integrity.</p> <p>For example, the device stores books as AZW or MOBI files. Both of these file formats provide the file with encryption to prevent the unauthorized access of the protected content. On information and belief, the Amazon Kindle app keeps the encryption keys stored in a secure location.</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<div data-bbox="699 240 810 293" data-label="Section-Header">MOBI</div> <p data-bbox="699 321 1749 391">The Mobipocket ebook format is another open standard for eBook publishing. It was bought by Amazon. It is also cross-platform. eBooks in this format can have the .prc or .mobi extension.</p> <p data-bbox="699 444 1770 672">MOBI formats can take complex content, include advanced navigation controls, supports indexing and a high degree of compression. For instance, readers can add their own pages, freehand drawings, annotations, highlights, bookmarks, corrections, and notes if devices support it. It can also include a dictionary. MOBI formats are suited for smaller screens because the image size limitation of 64K. The image size and image format (GIF) puts the format at odds with larger display devices like tablets.</p> <p data-bbox="699 725 1413 753">MOBI can also display reflowable content and fixed width layout.</p> <div data-bbox="699 807 789 860" data-label="Section-Header">AZW</div> <p data-bbox="699 883 1770 1034">AZW is a proprietary format developed by Amazon specifically for the Kindle eBook reader. It has its roots in the MOBI format but has <i>better compression and encryption</i> apart from a few more changes. The AZW format has found its place in many platforms with Kindle reading apps apart from Kindle. But AZW files can only be obtained from the Amazon online bookstore.</p> <p data-bbox="699 1088 1770 1196">AZW format is DRM (Digital Rights Management) restricted and is locked to the device id which is registered automatically with the user account of the Kindle purchaser. But DRM free books also carry the AZW extension but they are really no different from MOBI files.</p> <p data-bbox="558 1256 1724 1289">http://www.guidingtech.com/9661/difference-between-epub-mobi-azw-pdf-ebook-formats/</p> <p data-bbox="558 1328 1890 1396">For example, when the user attempts to use an Apple Accused Instrumentality to download a previously purchased book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<p>system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the requester mode and requests another distributed repository (Amazon Kindle Store) for access to the content.</p> <p>Further, when the user requests to view a previously downloaded book (by tapping on “Device” icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality’s distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) functions in the server mode and displays the book according to the usage rights associated with the book.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p>


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Claim 1	Apple Accused Products (Amazon Kindle)
	<p data-bbox="646 240 1801 358">Buy & Download from Kindle for iPad, iPhone, and iPod touch</p> <p data-bbox="646 410 1801 529">Although you can't shop for Kindle content directly from the Kindle reading app, you can shop from the Kindle Store using the Safari browser and deliver Kindle titles to the Kindle reading app on your iPad, iPhone, or iPod touch.</p> <hr data-bbox="646 565 1829 568"/> <p data-bbox="646 600 1829 667">Your device must be connected to a wireless or data network in order to download Kindle content to your Kindle reading app.</p> <ol data-bbox="667 703 1801 1068" style="list-style-type: none"> 1. From the Safari browser, visit the Kindle Store website: <ul style="list-style-type: none"> ◦ iPad: Kindle Store for iPad ◦ iPhone or iPod Touch: Kindle Store for iPhone or iPod Touch 2. Sign in to the Kindle Store with the same Amazon account you used when you registered the Kindle reading app. 3. Browse for Kindle titles you want to read, and then tap to view the product detail page. 4. To buy a Kindle title: tap Buy Now with 1-Click. <ul style="list-style-type: none"> ◦ To buy a book or one issue of a magazine or newspaper, tap Buy Now with 1-Click. ◦ To subscribe to a periodical, tap Subscribe now. 5. Click Read now to open the book in your Kindle app. <p data-bbox="646 1109 1818 1175">After you purchase content, your titles are delivered to the Kindle app on your iPad, iPhone, or iPod touch.</p> <p data-bbox="562 1243 1537 1274">http://www.amazon.com/gp/help/customer/display.html?nodeId=201244870</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<div data-bbox="653 235 1709 354"><h2>Deliver to Kindle for iPad, iPhone, and iPod touch</h2></div> <div data-bbox="653 397 1759 479"><p>Deliver books, periodicals, and personal documents from Your Kindle Library to your Kindle reading app.</p></div> <div data-bbox="653 539 1814 609"><p>To successfully deliver Kindle content, the Kindle reading app must be registered to the same Amazon account you use to purchase Kindle content.</p></div> <div data-bbox="653 641 1793 711"><p>After you buy a Kindle book, magazine, or newspaper, the title is saved to Your Kindle Library in the Cloud. New purchases are sent to your reading app and appear under the Cloud tab.</p></div> <div data-bbox="667 738 1759 917"><ol style="list-style-type: none">1. Visit Manage Your Kindle and locate the content you want to deliver to Kindle for iOS.2. From the Actions drop-down, select Deliver to my.3. Select your iPhone, iPad, or iPod touch from the Deliver to my drop-down, and then select Deliver.4. From the Kindle reading app Home screen, tap the Device tab to view and open the title.</div> <div data-bbox="558 982 1885 1015"><p>http://www.amazon.com/gp/help/customer/display.html/ref=hp_left_sib?ie=UTF8&nodeId=201244880</p></div>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<div data-bbox="615 228 1850 649"> <h2 data-bbox="632 240 940 293">Read Books</h2> <p data-bbox="632 342 1766 423">You can turn pages, add bookmarks or notes, and highlight text while you are reading Kindle books, just like with print books.</p> <hr data-bbox="632 456 1850 461"/> <ul data-bbox="659 488 1839 634" style="list-style-type: none"> • View books - From the Kindle reading app Home screen, tap the Menu  icon, tap Books, and then tap a title to open it. <ul style="list-style-type: none"> ◦ Tap Cloud to access books that aren't downloaded to your device. Tap the book to add it to your device. </div> <p data-bbox="562 688 1537 721">http://www.amazon.com/gp/help/customer/display.html?nodeId=201244920</p>
<p>wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights,</p>	<p>On information and belief, each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the server mode of operation is operative to enforce usage rights associated with the content and permit the rendering device to render the content in accordance with a manner of use specified by the usage rights.</p> <p>When the user requests to view a previously downloaded book (by tapping on “Device” icon displayed on the Apple Accused Instrumentality), the Apple Accused Instrumentality’s distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) checks for the usage rights associated with the book and determines if the requested manner of use is in accordance with the usage rights and permits the rendering accordingly.</p> <p>For example, when the user attempts to read a previously downloaded book on the Apple Accused Instrumentality, the Apple Accused Instrumentality’s repository (implemented as a trusted system which maintains physical, communications and behavioral integrity) checks for the Text to Speech /X-ray permissions associated with the book. Based on this information, the Apple Accused Instrumentality’s repository (implemented as a trusted system which maintains physical integrity, communications</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<p>integrity and behavioral integrity and supports usage rights) permits the rendering of Text to Speech/X-Ray feature of the book accordingly.</p> <p>Pursuant to P.R. 3-1(g), ContentGuard asserts that this claim element is a software limitation and will supplement its contentions for this claim element once sufficient source code has been produced and reviewed by ContentGuard.</p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <h2 style="margin: 0;">Deliver to Kindle for iPad, iPhone, and iPod touch</h2> <p style="margin: 10px 0;">Deliver books, periodicals, and personal documents from Your Kindle Library to your Kindle reading app.</p> <hr style="margin: 10px 0;"/> <p style="margin: 10px 0;">To successfully deliver Kindle content, the Kindle reading app must be registered to the same Amazon account you use to purchase Kindle content.</p> <p style="margin: 10px 0;">After you buy a Kindle book, magazine, or newspaper, the title is saved to Your Kindle Library in the Cloud. New purchases are sent to your reading app and appear under the Cloud tab.</p> <ol style="list-style-type: none"> 1. Visit Manage Your Kindle and locate the content you want to deliver to Kindle for iOS. 2. From the Actions drop-down, select Deliver to my. 3. Select your iPhone, iPad, or iPod touch from the Deliver to my drop-down, and then select Deliver. 4. From the Kindle reading app Home screen, tap the Device tab to view and open the title. </div> <p>http://www.amazon.com/gp/help/customer/display.html/ref=hp_left_sib?ie=UTF8&nodeId=201244880</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Product Details</p> <p>File Size: 447 KB</p> <p>Print Length: 276 pages</p> <p>Page Numbers Source ISBN: 0140086838</p> <p>Publisher: Penguin Classic; Anniversary edition (December 26, 2006)</p> <p>Sold by: Amazon Digital Services, Inc.</p> <p>Language: English</p> <p>ASIN: B000SEFBJ8</p> <p>Text-to-Speech: Enabled <input checked="" type="checkbox"/></p> <p>X-Ray: Not Enabled</p> <p>Lending: Not Enabled</p> <p>Amazon Best Sellers Rank: #2 in Kindle Store (See Top 100 Paid in Kindle Store)</p> <p>#2 in Kindle Store > Politics & Social Sciences > Social Sciences > Special Groups > Native American Studies</p> <p>#12 in Kindle Store > Kindle eBooks > Literature & Fiction > United States > Native American Studies</p> <p>#13 in Books > Politics & Social Sciences > Social Sciences > Specific Demographics > Native American Studies</p> <p>http://www.amazon.com/Ceremony-Penguin-Classics-Deluxe-Edition-ebook/dp/B000SEFBJ8/ref=pd_sim_kstore_6?ie=UTF8&refRID=1PJXTCS2TKEQKV5FQ81N</p> <p>Product Details</p> <p>File Size: 447 KB</p> <p>Print Length: 276 pages</p> <p>Page Numbers Source ISBN: 0140086838</p> <p>Publisher: Penguin Classic; Anniversary edition (December 26, 2006)</p> <p>Sold by: Amazon Digital Services, Inc.</p> <p>Language: English</p> <p>ASIN: B000SEFBJ8</p> <p>Text-to-Speech: Enabled <input checked="" type="checkbox"/></p> <p>X-Ray: Not Enabled <input checked="" type="checkbox"/></p> <p>Lending: Not Enabled</p> <p>Amazon Best Sellers Rank: #2 in Kindle Store (See Top 100 Paid in Kindle Store)</p> <p>#2 in Kindle Store > Politics & Social Sciences > Social Sciences > Special Groups > Native American Studies</p> <p>#12 in Kindle Store > Kindle eBooks > Literature & Fiction > United States > Native American Studies</p> <p>#13 in Books > Politics & Social Sciences > Social Sciences > Specific Demographics > Native American Studies</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<p data-bbox="558 269 1793 337">http://www.amazon.com/Ceremony-Penguin-Classics-Deluxe-Edition-ebook/dp/B000SEFBJ8/ref=pd_sim_kstore_6?ie=UTF8&refRID=1PJXTCS2TKEQKV5FQ81N</p> <div data-bbox="583 375 1885 922"> <p data-bbox="590 386 842 418">Product Details</p> <p data-bbox="636 435 850 459">File Size: 302 KB</p> <p data-bbox="636 475 938 500">Print Length: 291 pages</p> <p data-bbox="636 516 1167 540">Page Numbers Source ISBN: 0452280621</p> <p data-bbox="636 557 1247 581">Publisher: Vintage; Reprint edition (July 24, 2007)</p> <p data-bbox="636 597 863 621">Language: English</p> <p data-bbox="636 638 884 662">ASIN: B000TWUTYG</p> <p data-bbox="636 678 1020 703">Text-to-Speech: Not enabled <input type="checkbox"/></p> <p data-bbox="636 719 852 743">X-Ray: Enabled <input checked="" type="checkbox"/></p> <p data-bbox="636 760 852 784">Lending: Not Enabled <input type="checkbox"/></p> <p data-bbox="636 800 852 824">Amazon Best Sellers Rank:</p> <p data-bbox="722 841 1885 922">#7 in Kindle Store > Kindle eBooks > Literature & Fiction > Literary Fiction > African American Literature #59 in Kindle Store > Kindle eBooks > Literature & Fiction > African American Literature #66 in Books > Literature & Fiction > United States > African American Literature</p> </div> <p data-bbox="1257 808 1743 833">Store (See Top 100 Paid in Kindle Store)</p> <p data-bbox="558 963 1535 995">http://www.amazon.com/Beloved-Toni-Morrison-ebook/dp/B000TWUTYG</p>

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Claim 1	Apple Accused Products (Amazon Kindle)
	<p>Product Details</p> <p>File Size: 302 KB</p> <p>Print Length: 291 pages</p> <p>Page Numbers Source ISBN: 0452280621</p> <p>Publisher: Vintage; Reprint edition (July 24, 2007)</p> <p>Language: English</p> <p>ASIN: B000TWUTYG</p> <p>Text-to-Speech: Not enabled <input type="checkbox"/></p> <p>X-Ray: Enabled <input checked="" type="checkbox"/></p> <p>Lending</p> <p>Amazon X-Ray is available on all Kindle Touch, Kindle Paperwhite, Kindle Fire HD, the latest generation Kindle Fire, and the Kindle iOS Reader app.</p> <p>Find in Kindle Store (See Top 100 Paid in Kindle Store)</p> <p>s > Literature & Fiction > Literary Fiction > African American</p> <p>s > Literature & Fiction > African American</p> <p>> United States > African American</p> <p>Would you like to give feedback on images or tell us about a lower price?</p> <p>http://www.amazon.com/Beloved-Toni-Morrison-ebook/dp/B000TWUTYG</p>
the requester mode of operation is operative to request access to content from another distributed repository, and	<p>Each of the Apple Accused Instrumentalities comprises a distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) wherein the requester mode of operation is operative to request access to content from another distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights).</p> <p>For example, when a user attempts to use an Apple Accused Instrumentality to download a previously purchased book, the Apple Accused Instrumentality's distributed repository (implemented as a trusted system which maintains physical integrity, communications integrity and behavioral integrity and supports usage rights) requests another distributed repository (Amazon Kindle Store) for access to the content.</p>